

**Richborough Commercial**

# **MK City Plan 2050 Regulation 19 Consultation**

Date of report: December 2025



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# 1. Introduction

- 1.1 These representations are submitted on behalf of Richborough Commercial ('Richborough') who are promoting Richborough Park – MK South ('the Site'). The Site comprises approximately 46.06 ha of undeveloped land located adjacent to the south of the boundary of the Milton Keynes City Council (the 'Council') administrative area. The site is located in Buckinghamshire within the former Aylesbury Vale area. The Site is being promoted for allocation in the emerging Buckinghamshire Local Plan for mixed use employment comprising Use Classes E(g)(iii), B2 and B8 with ancillary office areas.
- 1.2 Separate representations have been submitted by Savills to Buckinghamshire Council, most recently to the Regulation 18 Local Plan consultation which closed in October 2025. A copy of these representations are appended to this report.
- 1.3 Also appended to these representations is an Industrial & Logistics (I&L) Needs Assessment (December 2025), prepared by Savills Economics. This reviews the economic evidence base that has been prepared to support the consultation documents. It also assesses Milton Keynes' functional and spatial relationship with Buckinghamshire and the Site's unique characteristics and spatial links to Milton Keynes. The appended analysis demonstrates how the Site is well-positioned to address the acute deficit of I&L land in Milton Keynes.
- 1.4 In summary, these representations make clear the site has the potential to make a significant contribution to meeting needs for employment land identified in the Milton Keynes evidence base that is not currently being planned for in the draft Local Plan. These representations set out proposed changes to the draft Plan in the context of the tests of soundness for Milton Keynes' consideration prior to the submission of the Plan for Examination.
- 1.5 At the time of writing the Government is also consulting on a revised version of the National Planning Policy Framework (NPPF) until March 2026. Whilst this consultation document holds very limited weight, and its draft policies on plan making are not relevant due to the timescales the Milton Keynes Plan is being progressed under, once published the updated policies of the NPPF will be a key material consideration for planning applications. The document is therefore relevant and its draft national decision making policies are pertinent for the Site and future planning applications
- 1.6 What is clear in the draft document is the Government's strengthening of support for development for employment uses (including industrial and logistics) particularly where there is evidenced unmet need (which is evidenced by 'market signals' as per the enclosed Savills I&L Needs Assessment).
- 1.7 Pertinently, draft Policy S5 (Principle of Development Outside Settlements) identifies that certain types of development should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects when assessed against the national decision-making policies in the NPPF. This includes (j) development which would address an evidenced unmet need, and where the development would:
- Be well related to an existing settlement and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or
  - Comprise major development for storage and distribution purposes which accords with Policy E3.
- 1.8 This proposed policy approach is reflective of the Government's ambitions for the planning system to unlock development to stimulate economic growth. It would be feasible for Milton Keynes to follow a similar approach in its own Local Plan. Within these representations, we propose revisions to the Plan so it is able to be more supportive of development on land adjacent to the Milton Keynes

boundary responding to evidenced need, particularly as the Plan itself identifies a significant shortfall of employment land not addressed in the Plan.

## **1.9 About Richborough**

- 1.9.1 Richborough is the UK's leading independent strategic land promotion business, established in 2003. It aims to work responsibly and in partnership with landowners, local authorities and key stakeholders to bring forward land for development.
- 1.9.2 Richborough's projects are located throughout the country, ranging from schemes of around 100 homes to large strategic urban extensions for a mix of uses. With offices in Birmingham, Bristol, London, Manchester and Nottingham, the Richborough team comprises a blend of chartered industry professionals, including planners, surveyors, architects, urban designers, engineers and project managers. This makes Richborough well-equipped to accelerate the delivery of realistic, market-facing schemes.
- 1.9.3 Richborough oversees the entire planning process from start to finish. It identifies suitable opportunities, undertakes technical surveys, designs masterplans, promotes sites through local plans, secures outline planning permission and sells consented land to a range of development partners, from SME builders to large PLC developers. To date, the land it has promoted has delivered over 30,000 new homes.
- 1.9.4 Richborough is also a founding member of the Land, Planning and Development Federation (LPDF) and a proud member of the British Property Federation (BPF) and Home Builders Federation (HBF).

## **1.10 Richborough Commercial**

- 1.10.1 Richborough Commercial is the commercial development arm of strategic land promoter, Richborough. It specialises in accelerating the delivery of land for employment-generating uses, including industrial and logistics, data centres, retail, roadside schemes and mixed-use developments.
- 1.10.2 Richborough Commercial is currently promoting over 17 million sqft of floorspace in well-connected and sustainable locations, including those close to key motorway junctions, along major road corridors and within easy reach of airports, ports and rail freight terminals. It targets sites where a demonstrable need for additional employment land and job creation exists and takes account of local consumers, labour and supply chains.
- 1.10.3 Richborough Commercial takes a bespoke approach to promoting each opportunity, tailored to the local and wider strategic context within which the site is situated. It can flex its approach to meet the aspirations of local authorities and other stakeholders while responding to growing demand arising from both established and emerging sectors and changing market conditions, including interest from prospective developers and potential future occupiers.
- 1.10.4 As well as being a strong advocate of high-quality urban design and placemaking, Richborough Commercial prides itself on leaving a lasting legacy for future generations by creating additional local training and employment opportunities. It has worked within the commercial sector for many years, promoting multiple sites across the country and seeing them built out by development partners and successfully occupied by local and national employers.
- 1.10.5 For further details, please visit [www.richborough.co.uk](http://www.richborough.co.uk).

## 2. Site Benefits and Future Allocation

### 2.1 Introduction

- 2.1.1 The site is being promoted for a strategic employment development. Current indicative masterplanning work suggests that the Site is capable of delivering around 127,645 sqm (1,373,959 sq ft) of employment floorspace.

### 2.2 Site Description

- 2.2.1 The Site is under the control of Richborough Commercial who are promoting it for development on behalf of the landowners. It is approximately 46.06 ha in size and is currently in agricultural use. Running alongside (but outside) its western boundary is a railway line, and it is bordered on the north and west sides by the A4146. This road is located within Buckinghamshire Council, but to the immediate north of it is the boundary of Milton Keynes City Council and established residential development.
- 2.2.2 To the west of the site, beyond both the railway line and the A4146 is land that is currently subject a pending outline planning application submitted by Richborough for 290 homes (ref. 24/03601/AOP). The application was validated 2 December 2024, and an appeal was lodged against non-determination on 4 August 2025 (ref. APP/J0405/W/25/3370338). A three-day hearing and site visit was held between 9-11 December with a target decision date of 31 January 2026.
- 2.2.3 To the east of the Site is Stoke Road, beyond which is scattered development across a range of uses including sui generis and institutional residential. To the south of the site is additional agricultural land, beyond which is the village of Stoke Hammond.
- 2.2.4 There is a Public Right of Way (PRoW) (code SHA/2/1) running north-south along the western boundary that connects the Site to both Milton Keynes to the north (via an underpass) and Stoke Hammond to the south. This connects along an access track via a bridge over the railway line and underpass underneath the A4146 to a PRoW bridleway to the west (code SHA/8/4), which provides a further connection to Milton Keynes to the west through the residential scheme being promoted by Richborough under planning application 24/03601/AOP mentioned above.
- 2.2.5 To the north of the Site, and stopping at Bletchley Railway Station, is the East West Rail line that runs between Oxford and Cambridge via Bicester, Milton Keynes, and Bedford. The under-construction route currently extends from Oxford to Milton Keynes. The Site also has links to the Redways cycle network at Lomond Drive on the north side of the A4146.
- 2.2.6 The Site is designated within the open countryside. Land to the east is designated as an 'Attractive Area of Landscape' (AAL) in the Vale of Aylesbury Local Plan (adopted September 2021). The site is within Flood Zone 1. An extract of the enclosed Wider Context Illustrative Masterplan is reproduced below showing the Site in context as an extension to the settlement of Milton Keynes with the Site shown in the context of Milton Keynes at Figure 2.



Figure 1: Wider Context Illustrative Masterplan



Figure 2: Site Location adjacent to Milton Keynes (Source: Savills Maps)

## 2.3 Proposed Development

- 2.3.1 The site is being promoted through the emerging Buckinghamshire Local Plan for a landscape-led, mixed use, flexible employment site capable of making a meaningful contribution to unmet employment need within both Buckinghamshire and Milton Keynes. It will deliver space that is suitable for meeting modern occupier requirements, and includes provision of a range of units, including 'big box' units in excess of 9,300 sqm (100,000 sq.ft.). As set out in the appended I&L Needs Assessment, there is a structural shortage of units of this size within the local area.
- 2.3.2 The landscape-led nature of the scheme will respond sensitively to surrounding context, including the historical village of Stoke Hammond to the south, and the woodland and River Ouzel to the east, as well as the wider 'Attractive Area of Landscape'.
- 2.3.3 The current proposals, as set out below, provide for a scheme capable of delivering around 127,645 sqm GIA (1,373,959 sq.ft) of floorspace across a wide range of floorplates to ensure that the site is capable of accommodating the fullest possible range of occupiers.
- 2.3.4 As shown on the Illustrative Masterplan submitted alongside these representations (ref. 225039-IMA-ST-ZZ-DR-A-031002), the emerging proposals are for eight buildings (three of which can be subdivided), offering units between 3,104 sqm (33,410 sq.ft) and 26,030 sqm (280,182 sq.ft), and an internal height of between 12m to 15m to haunch. However, these are only illustrative plans at this stage and by their very nature Richborough has the flexibility to accommodate a different mix of units subject to market requirements and feedback from the Local Planning Authority.
- 2.3.5 Two points of vehicular access to the Site are proposed via Stoke Road on the Site's eastern border. And it is proposed to formally link the two PRoWs mentioned above (SHA/2/1 and SHA/8/4) as part of the PRoW network, ensuring good active travel links between both Milton Keynes and Stoke Hammond.
- 2.3.6 The proposals will provide a minimum 45m landscape buffer to the south of the site, mindful of the gap with Stoke Hammond village to the south, and include attenuation ponds as part of a sustainable drainage strategy that will integrate with the existing topography as part of the landscape-led design. The combination of ecology rich green space and wildlife friendly sustainable drainage will provide opportunities to support biodiversity.



Figure 3: Illustrative Masterplan

## 2.4 Site Benefits and Future Allocation

### National Context – Planning Policy

- 2.4.1 The Site is located south of, and adjacent to, the settlement boundary of Milton Keynes, a major city within the Oxford Cambridge Growth Corridor, a key pillar in the Government's stated ambition to deliver economic growth.
- 2.4.2 The Government's continuing commitment to this spatial policy was reiterated in the *Oxford-Cambridge Growth Corridor Investment Prospectus*, published on 21 October 2025, where the Chancellor of the Exchequer noted the following:

*“Economic growth is the number one mission of this government and remains at the heart of all we do. The Oxford to Cambridge Growth Corridor is a key pillar of this mission and offers huge potential for the UK. It is Europe’s answer to Silicon Valley.*”

*Deepening the links between Oxford and Cambridge, Milton Keynes, Bedford and beyond with significant investment into East West Rail, will ultimately connect a region of 3.5 million people – highly skilled, highly employable, and highly mobile. Investors and businesses alike can seize the opportunity to be part of the Golden Triangle, bringing together the Corridor and London as one of the world's top innovation clusters."*

2.4.3 At a national level, the area forms a vital part of the strategic drive towards greater economic growth – one to which the Site can make a meaningful contribution.

2.4.4 Beyond the Government's interest in delivering employment within the Oxford Cambridge Growth Corridor, it is also worth establishing that there is strong support within the NPPF for meeting employment needs. In order to meet the presumption in favour of sustainable development, there is a requirement under paragraph 11(b) of the NPPF for plan-making to provide as a minimum for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

2.4.5 Paragraphs 85 to 87 of the NPPF concern the Government's strategic goal of building a strong, competitive economy. Paragraph 85 states that:

*"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."*

2.4.6 Under paragraphs 86, planning policies should:

- *"set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth;*
- *set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- *pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics; and*
- *be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances."*

2.4.7 Finally, paragraph 87 is clear that planning policies should both recognise and address the specific locational requirements of different sectors. This includes making provision for:

*"Storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation."*

## Regional Context

2.4.8 Regionally, the Site benefits from a number of strategic advantages: it has proximity to nationally significant movement corridors (M1, M40, East West Rail), which grants it convenient access to major freight handling infrastructure that can be used as part of wider supply chains for a range of sectors. These locational benefits ensure a reduction in both financial costs and environmental impacts owing to shorter distances travelled (the latter being particularly important with regard to the Environmental, Social, and Governance objectives of employers).

- 2.4.9 The site is close to Bletchley Railway Station, which now has a connection to Oxford via the East West Rail, a major infrastructure scheme linking Oxford to Cambridge, and ensures the Site is well placed to take advantage of, and contribute to the aspirations of the Growth Corridor.

### **Local Context**

- 2.4.10 The Site forms a natural urban extension to Milton Keynes, particularly in the context of Richborough's appeal for 290 homes to the Site's west (ref. 24/03601/AOP, discussed above). From a locational perspective, the site is ideally placed to respond to local employment need and to take advantage of local circumstances.
- 2.4.11 The Site's proximity to Milton Keynes ensures ready and convenient access to a large labour supply, as well as strong transport links at the local level of public transport (via the Red routes and PRowS mentioned above), as well as those of a regional and national scale mentioned above. There is also, as part of the Site's development strategy, an opportunity to provide a bus service through the Site, further increasing local connectivity, and improving transport links between Milton Keynes and Stoke Hammond.
- 2.4.12 Another key aspect of the local picture is the significant level of increased housing required under the revised Standard Method published in December 2024. Under this metric, the housing requirement in Milton Keynes is 1,724 dwellings per annum (dpa), When one includes the 4,319 dpa that Buckinghamshire are required to provide, this equates to 6,043 dpa. This is an ambitious housing requirement, which must be provided for as a minimum under paragraph 11(b) of the NPPF. Both Milton Keynes and Buckinghamshire must ensure that they are planning for an appropriate amount of employment floorspace to ensure that residents have a sufficient amount of high quality jobs.

## **2.5 Site-Specific Advantages**

- 2.5.1 The Site constitutes agricultural land, immediately adjacent to Milton Keynes, and is a logical development site for the delivery of a landscape-led scheme that makes a meaningful contribution to the Council's unmet employment land need.
- 2.5.2 The Site benefits from existing infrastructure that it can connect into early in the plan period. Owing to excellent transport connections and the Site's natural extension to the city of Milton Keynes, the Site can be delivered quickly without the need for wider infrastructure works that could delay the Site coming forward. Development of the Site would present the opportunity to connect to existing sustainable travel routes and future improvements (including East West Rail). This is a significant advantage compared to other growth options which are likely to take longer to deliver (for example new settlements or large Strategic Urban Expansions).

## **2.6 Addressing Unmet Need**

- 2.6.1 The Regulation 19 draft of Milton Keynes' emerging Local Plan confirms an unmet employment need of 223 ha within the Council. This is a considerable employment land shortfall, and Milton Keynes have confirmed that they are unable to meet this within their own local authority area.
- 2.6.2 It is relevant to note that Buckinghamshire Council consulted on its Regulation 18 Local Plan in October 2025 and has not put forward a strategy that seeks to meet the unmet needs of

neighbouring authorities. This is a core requirement of plan-making under paragraph 11(b) of the NPPF.

- 2.6.3 Under the requirements of national planning policy, Milton Keynes needs to consider the role that neighbouring authorities can play in helping to address their unmet need. This is covered in our requested changes to the wording of Policy GS11. As drafted in the consultation document, the policy merely sets a series of design requirements for development adjacent to its boundary. However, this policy should go much further in establishing appropriate development beyond the boundary especially where it responds to the needs identified by the Council.
- 2.6.4 At a minimum, the policy should be updated to support:
- The proactive exploration of sites within Buckinghamshire to meet MK's development needs as part of a sustainable expansion of the settlement boundary of Milton Keynes; and
  - In-principle support for development within Buckinghamshire, and adjacent to Milton Keynes, that is being promoted and addresses Milton Keynes unmet need.
- 2.6.5 This representation sets out policy wording that recognises the role that neighbouring authorities must play if the Council's needs are to be met, and establishes the Council's support for development schemes in neighbouring authorities that can contribute to MK's unmet need.
- 2.6.6 The Site is relatively unconstrained, well-located to existing infrastructure, and comprises a natural urban extension. It is therefore a high-quality development site to deliver employment. Being an extension of Milton Keynes, it is ideally placed to contribute to Milton Keynes unmet employment needs.

## **2.7 Site Benefits**

- 2.7.1 Indicative masterplanning exercises show that the site is capable of delivering around 127,645sqm (1,373,959 sq.ft). This will include a range of unit sizes from large floorplate 'big box' units in excess of 9,300 sqm (100,000 sq.ft) as well as mid-box and small box buildings meeting the requirements of a range of potential occupiers. The site is well suited to meeting needs within Milton Keynes owing to its adjacency to the settlement boundary.
- 2.7.2 The Site represents an excellent opportunity to deliver high quality and much needed employment space that is capable of addressing significant (and unmet) employment need, and making a meaningful contribution to Milton Keynes' economy and the wider sub-region.
- 2.7.3 The site is also being progressed by Richborough Commercial as a specialist land promoter with a track record of delivery, meaning that the site has the potential to be delivered at speed.

## 3. Context for Representations

### 3.1 Structure and Context of these Representations

- 3.1.1 These representations have been prepared in the context of national planning policy and legislation setting out the necessary approach to plan-making and the tests of “soundness”. Section 20(5) of the Planning and Compulsory Purchase Act 2004 requires that all development plan documents must be submitted for independent examination to assess whether they are “sound”. Further to this, Section 19 of the 2004 Act requires local planning authorities to have regard to various matters, including national policies, such as those set out in the NPPF), alongside other advice contained in guidance issued by the Secretary of State.
- 3.1.2 There is no statutory definition of soundness, however paragraph 35 of the NPPF states that to be sound, a Local Plan should be:
- **“Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”

### 3.2 Cross-Border Cooperation

- 3.2.1 Land south of MK, whilst being ideally suited to meet Milton Keynes’ unmet employment need, is located within the administrative boundary of Buckinghamshire. It would need to be allocated within Buckinghamshire’s emerging Local Plan in order to come forward to meet Milton Keynes’ considerable unmet need. The Council needs to proactively engage with Bucks prior to the submission of their Plan to the Secretary of State for Examination, and update the draft Plan to offer support for development outside Milton Keynes’ boundaries that responds to meet its needs. This is particularly pertinent as Milton Keynes acknowledges in its Plan and evidence base that the Local Plan does not deliver its needs in full and large parts of the Borough are constrained.
- 3.2.2 Historically, this cooperation has sought to be achieved through the Duty to Co-operate, a legal requirement introduced under S.110 of the Localism Act 2011 and which required *inter alia* local planning authorities and county councils to co-operate with each other in order to maximise the effectiveness with which Local Plans are prepared.
- 3.2.3 On 27 November 2025, the Planning Practice Guidance (PPG) was updated to include a ‘new system’ for preparing Local Plans. Plans can, however, be submitted under the current system until December 2026, and it is expected that Milton Keynes will seek to submit their Plan to be examined against the legacy framework.

3.2.4 A written ministerial statement (WMS), also issued on 27 November 2025, confirming that the Duty to Co-operate will not be retained, and will also be dropped from the current system.

3.2.5 Whilst the Duty to Co-operate is therefore not expected to apply, the WMS of 27 November makes it clear that cross-border collaboration should remain:

*“Local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas, and we expect Planning Inspectors to continue to examine plans in line with the policies in the NPPF on ‘maintaining effective co-operation.’”*

3.2.6 To this end, the need to maintain effective co-operation is set out within paragraphs 24-28 of the NPPF, which collectively state that:

- Strategic policy-making authorities should collaborate to identify the relevant strategic matters which Plans need to address;
- Effective and ongoing joint working is integral to producing a positively prepared and justified strategy that can determine whether unmet development needs can be met elsewhere;
- Plans should ensure that *inter alia* unmet development needs from neighbouring areas are provided for in accordance with paragraph 11b;
- Any allocation or designation which cuts across the boundary of plan areas, or has significant implications for neighbouring areas, is appropriately managed by all relevant authorities; and
- Strategic policy-making authorities should prepare and maintain statement(s) of common ground, documenting cross-boundary matters and the progress made in cooperating to address these.

3.2.7 The clear need for LPAs to consider meeting the unmet needs of neighbouring authorities is enshrined as a core part of the presumption in favour of sustainable development in paragraph 11:

*“Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that*

*b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

3.2.8 Whilst the Duty to Co-operate is not therefore expected to be a matter of legal compliance for Milton Keynes’ Local Plan examination, it is nevertheless a core aspect of preparing a sound plan under national planning policy.

3.2.9 It is in the context of meeting unmet need for neighbouring authorities that this representation has been prepared. The Plan as currently drafted is not considered sound in the context of its own acknowledgment of unmet employment need. It ought to include clear policy support for proactive exploration of sites within Bucks to meet MK’s development needs, and in-principle support for development within Bucks adjacent to Milton Keynes’ boundary that is capable of being delivered to address Milton Keynes unmet needs including its significant shortfall in employment land.

- 3.3 The Regulation 19 consultation exercise is comprised of two separate parts, alongside a range of evidence base documents. The main consultation documents to which this representation responds are:
- Proposed Submission (Regulation 19) MK City Plan 2050;
  - Sustainability Appraisal;
  - Duty to Cooperate Statement.
- 3.4 For the avoidance of doubt, these representations focus on those parts of the consultation documents considered most relevant to the promotion of the Site for employment use. Separate representations have been submitted regarding Richborough's other residential interests elsewhere.

## 4. Proposed Submission (Regulation 19) MK City Plan 2050

### 4.1 Policy GS3: Strategy for Economic Prosperity

#### 4.1.1 Summary of Policy

4.1.2 The policy allocates approximately 207.5 ha of land across all employment uses, noting the range of development options that the allocated sites can provide. The allocated supply is set out below, set against the anticipated requirements over the Plan period (from which the Plan states) have been discounted completions and commitments that have (or will) come forward over the Plan period:

<b>I&amp;L Land Deficit Over Draft Plan Period (2022-2050)</b>	
<b>Total Land Supply for E(g)i-iii, B2, and B8</b>	<b>207.5 ha</b>
Net Requirements (accounting for completions / commitments)	
<i>Industrial (E(g)iii and B2)</i>	<i>(57 ha)</i>
<i>Warehousing &amp; Logistics (B8)</i>	<i>(310 ha)</i>
<b>Total Net Requirement for I&amp;L</b>	<b>(367.0 ha)</b>
<b>Minimum I&amp;L Land (Deficit)*</b>	<b>(159.5 ha)</b>

\* This assumes that all of the 207.5ha of new employment land is for I&L. It is unlikely that all of this will come forward for I&L. Therefore the I&L deficit, indicated by parentheses, is highly likely to be significantly greater than 160ha.

4.1.3 The details of the commitments and completions are not interrogated here, as – even taking the Plan’s figures at face value – there is a minimum undersupply of 159.5 ha for I&L uses. The fully realised unmet need is likely to be appreciably greater owing to the fact that R&D uses are explicitly supported across 173 ha of the total allocated supply of 207.5 ha. It is therefore considered highly unlikely that all 207.5 ha of the allocated land will be for I&L. Table 3 of the Draft Plan states that the anticipated requirement for office floorspace (incl. R&D) is 66 ha (greater than that anticipated for industrial uses).

4.1.4 The supporting text for the policy confirms at paragraph 38 both that these demand estimates represent the mid-range of expected requirements, and that the Plan is not planning for its claimed need:

*“Table 3 sets out forecast net future sites requirement in hectares for office, industrial and warehousing development in Milton Keynes over the plan period, under the Mid/medium scenario. Under this scenario office development will require 66 hectares of land, industrial floorspace 57 hectares of land and warehousing will require 310 hectares of land. The total forecast requirement for land for office, industrial and warehousing sites is 433 hectares, which significantly exceeds the supply of employment land available at around 207.5 hectares. However, at 310 hectares (72%) most of this forecast requirement for land is for warehousing. If suitable sites for warehousing development are not available in Milton Keynes, developers will seek to develop sites where suitable sites are available.”*

#### 4.1.5 Comment

4.1.6 This policy does not constitute a sound approach. It is not positively prepared, not justified, not effective, and not consistent with national policy.

4.1.7 The approach suggested by the final sentence of paragraph 38 (i.e. that if suitable sites for warehousing are not available in MK “*developers will seek to develop sites where suitable sites are available*”) is inconsistent with national policy. The NPPF clearly states (para. 85) that planning policies and decisions should help create the conditions in which business can invest, expand, and adapt; and (para. 11) that plans must provide for objectively assessed needs for housing and other uses, unless either aspects of the NPPF provide a strong reason for restricting development; or any adverse impacts of meeting need would significantly and demonstrably outweigh the benefits.

4.1.8 The Plan’s seeming comfort with failing to provide for its full objectively assessed employment needs appears to be influenced by paragraph 236 of the Milton Keynes Housing and Economic Development Assessment Update, dated October 2025 prepared by ORS and Hardisty Jones:

*“Whilst this analysis shows a potential shortfall of land for industrial and warehouse development, it is important to note that there is an element of circularity in such analysis. Demand will only emerge where suitable sites are available. For logistics uses in particular, the necessity for large flat sites with excellent strategic transport access is typically more important than immediate location. Occupiers will consider an area of search much larger than a single local authority area. If suitable sites do not exist the selection of alternatives will likely involve looking farther afield for sites which meet the requisite criteria, rather than considering a site in a specific location (i.e. Milton Keynes) that fails the criteria test.”*

4.1.9 There are a few points to note here:

- A projected shortfall of at least 159.5 ha is considered too great to merit downplay as “*a potential shortfall*”;
- The claim that demand “*will only emerge*” where suitable sites are available tactfully avoids recognising that this demand will continue to exist, and therefore be suppressed, if it is not able to “*emerge*” through the delivery of suitable sites;
- Whilst the HEDNA notes that the necessity for large sites with excellent strategic transport access is typically more important than “*immediate*” location, that is not to say that location is unimportant. Location is a key consideration for logistics occupiers.

4.1.10 The locational attractiveness of MK for I&L occupiers is made clear in paragraph 30 of the Draft Plan itself, which notes that within Milton Keynes:

*“[T]he logistics industry has exhibited strong growth in recent years, with many large warehouses constructed. In 2023, it employed 17,000 workers, 9.1% of all jobs in Milton Keynes City, significantly higher than the Great Britain average of 5%, indicating that Milton Keynes City has been a good location for this sector due to the M1 corridor and proximity to large markets in London and Birmingham. While demand in this sector remains strong, opportunities for further growth are diminishing due to the lack of suitable sites to accommodate the specific needs of this sector.”*

4.1.11 It is clear, from both the Draft Plan itself and its evidence, that MK is a locationally desirable area for I&L occupiers, and that continued strong demand is anticipated and recognised within the Draft Plan’s evidence base. MK have confirmed it is unable to plan for this level of demand. It is recognised that MK is a supply-constrained authority, especially to the south of the LPA’s area of jurisdiction, the border for which is conterminous with the settlement boundary.

- 4.1.12 However, it is not a sound approach to acknowledge that there is unmet need, and then fail to address the scope to meet this need in a plan-led fashion through an agreement to deliver sites in neighbouring authorities, and an evidence-backed strategy for ensuring that need is appropriately accommodated.
- 4.1.13 In order to ensure that MK's identified needs can be met and planned for, co-operation and cross-boundary engagement is required. Notwithstanding administrative boundaries, the Site forms a natural extension to the urban settlement of Milton Keynes, and ought to be recognised within the draft Plan as a sustainable site for the delivery of land to meet MK's employment needs.

The Plan should show explicit policy support for the exploration of opportunities to meet the employment shortfall over the Plan period on sites outside of the Plan area. This should include the Land South of Milton Keynes through the Bucks plan, and in-principle support for planning applications adjacent to the Milton Keynes boundary that responds to its unmet needs. This is discussed below in the context of Policy GS11 with revisions proposed to ensure a sound approach to plan making.

## **4.2 Policy GS11: Adjacent and cross-boundary growth**

### **4.2.1 Summary of policy**

- 4.2.2 The policy sets out a series of principles relevant for development proposals on the edge of Milton Keynes' administrative area that the policy expects will be followed. These include joint working with local authorities, and ensuring that the design and layout of neighbouring schemes respect the principles and character of Milton Keynes City to provide sustainable development.

### **4.2.3 Comment**

- 4.2.4 Land South of MK, being at the edge of MK's administrative area within Buckinghamshire Council, would be expected to consider the requirements of draft Policy GS11. Given this policy relates to land that is outside of MK's area of jurisdiction, it is expected the policy would serve an advisory role in guiding the development management including planning applications close to Milton Keynes where the Local Planning Authority would be a statutory consultee. With that in mind, Richborough do not object to any of the suggested expectations, in principle, in the interest of proper planning and indeed the masterplanning work undertaken for the site promotion has been prepared to meet the requirements of this draft policy.
- 4.2.5 Beyond this, Policy GS11 is the only one in the Plan that references co-operation with neighbouring authorities.
- 4.2.6 As set out in our comments to Policy GS3, the under-provision of economic land does not constitute a sound approach, and the Plan is currently forecasting an unmet need of 159.5 ha against its own evidence base.
- 4.2.7 In order to be found sound, and effective, the Plan needs, as part of its approach, to give appropriate consideration to the ability of neighbouring authorities to meet MK's unmet need.
- 4.2.8 Policy GS11 is for cross-boundary development, but it does not set out a strategy for meeting (in a plan-led fashion) how MK's unmet need can be met by neighbouring authorities. This is an oversight because MK is not meeting its own objectively assessed needs (the baseline requirement of sustainable plan-making as set out in paragraph 11 of the NPPF) on the grounds that there are not suitable sites. As a result of this, the Plan needs to give evidenced consideration to the ability of neighbouring authorities to meet this need as an alternative for a sound approach.

- 4.2.9 At a minimum, Policy GS11 ought to be amended to include the following text:
- *“The Council will support and contribute to the proactive exploration of sites within Buckinghamshire to meet MK’s development needs as part of a sustainable expansion of the settlement boundary of Milton Keynes; and*
  - *Give support in principle to development proposals within neighbouring authorities, including Buckinghamshire Council, that are capable of making a contribution to unmet needs in Milton Keynes.*
- 4.2.10 MK’s draft Plan is transparent in acknowledging the Plan does not make adequate provision for its own needs, and the challenges faced by the Council to meet its own needs within its administrative boundary. The Plan readily acknowledges that engagement with neighbouring authorities is required in order for this need to be met.
- 4.2.11 Policy GS11 clearly demonstrated the Council acknowledges the potential for development to come forward adjacent to its boundary and understandably considers itself a key stakeholder on adjacent schemes. As a result, the Local Plan must include support for the ability of neighbouring Councils to help address MK’s unmet need.

### 4.3 Proposed New Policy – Addressing Unmet Need

- 4.4 Whilst an amendment to Policy GS11 (as set out above) is required for soundness, the need for plan-making to address, as a minimum, an area’s objectively assessed needs is a core requirement of national planning policy, and is considered a matter that merits its own specific treatment (as opposed to inclusion as a sub-part of a wider policy).
- 4.5 With this in mind, the following text has been drafted for inclusion as a standalone policy within the draft Local Plan prior to submission for examination:

**New Policy XX: Meeting Milton Keynes Needs in Neighbouring Authorities**

*Owing to Milton Keynes’ inability to meet its own objectively assessed employment needs, the Council recognises that development in adjacent authorities will form a key part of addressing the needs of Milton Keynes over the Plan period. Owing to land and environmental constraints, and planned development activity and infrastructure including East-West Rail, the most logical expansion of the city of Milton Keynes is to the south of the existing settlement boundary in Buckinghamshire Council.*

*In order to ensure the Council’s objectively assessed needs are met over the Plan period, the Council will:*

- *actively support the consideration of land adjacent to Milton Keynes for the purpose of addressing unmet need as part of a sustainable expansion of the settlement boundary of the city of Milton Keynes;*
- *Give in-principle support to development proposals within neighbouring authorities, including Buckinghamshire Council to the south of Milton Keynes, that are capable of making a contribution to unmet needs in Milton Keynes; and*
- *Undertake and maintain proactive and regular engagement with neighbouring authorities, including Buckinghamshire Council, to identify land within neighbouring authorities that can help to address unmet need within Milton Keynes.*

- 4.5.1 Alongside this, the Key Diagram (p.20) should be amended to reflect the potential southward outwards extension of the city into Buckinghamshire Council. This area is already experiencing growth, as evidenced by existing and proposed housing development around Newton Leys.

# 5. Duty to Cooperate Statement

## 5.1 Summary

5.1.1 The Regulation 19 consultation is comprised of two separate parts, alongside a range of evidence base documents. This includes the Duty to Cooperate Statement, to which this Section relates.

5.1.2 As set out above, it is noted the Duty to Cooperate (DtC) is unlikely to be a legal requirement by the time the Draft Plan is subject to Examination. However, cooperation nevertheless remains a core policy directive within the NPPF (as set out above), and the WMS announcing the removal of the DtC (quoted above) confirmed that:

*“Local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas, and we expect Planning Inspectors to continue to examine plans in line with the policies in the NPPF on ‘maintaining effective co-operation.’”*

5.1.3 Therefore, in the context of both this and the scale of unmet employment need within MK, the proposed removal of the DtC ought not to lead to the Council declining to engage with neighbouring authorities in efforts to ensue that some or all of their unmet need can be met.

5.1.4 Paragraph 10 of the Draft Plan states that the Council liaised with neighbouring planning authorities through the Duty to Co-operate. This is set out in more detail within the Duty to Co-operate Statement that forms part of this present consultation. This includes, at Table 1 of that document, a list of all meetings held with neighbouring authorities over the period 2021-2025. It is replicated below.

LPA	Meeting dates	LPA	Meeting dates
Bedford Borough	24/10/2022	Central Beds (cont.)	13/06/2023
	17/09/2024		20/03/2024
Bucks	11/11/2021		09/09/2024
	28/10/2022		02/04/2025
	15/06/2023		04/07/2025
	19/03/2024		14/07/2025
	20/09/2024	North Northants	02/11/2022
	12/05/2025	West Northants	07/06/2023
Central Beds	19/03/2021		28/11/2024
	08/11/2022		

## 5.2 Comment

5.2.1 In total, over the previous five years, the Council has met with six neighbouring authorities a total of 19 times which equates to roughly once every three months. Milton Keynes met with Buckinghamshire Council six times or circa once a year. The dynamic between the Local Planning Authorities is interesting as Buckinghamshire directly adjoins MK’s settlement boundary and comprises one of the most sustainable locations for accommodating its unmet need.

5.2.2 As set out in paragraph 15 of the DtC Statement, the principal issues reportedly discussed across all 19 these meetings were:

- potential transport impacts;
- infrastructure planning;
- employment strategy (principally Central Bedfordshire, West and North Northants); and
- impacts of site allocations (principally Central Bedfordshire and Bucks Council).

5.2.3 Annex A of the DtC Statement includes letters from the Council to officers in neighbouring authorities, and confirms that employment was considered a matter that “*may require ongoing engagement*” with Buckinghamshire. For all other authorities, it was identified as a matter that “*will*” require ongoing engagement. We consider this is a missed opportunity to meaningfully explore the potential for plan making beyond administrative boundaries to facilitate economic growth.

5.2.4 Savills on behalf of Richborough Commercial submitted representations to the recent consultation on the Regulation 18 version of the Bucks Local Plan, addressing their unmet employment needs separately. These representations are appended to this representation for reference where there are clear overlaps between plan making being undertaken by both Local Planning Authorities.

5.2.5 According to the DtC Statement, at no point during the preparation of MK’s Plan does the Council appear to have discussed the ability of neighbouring authorities to help to address unmet employment need, nor do they appear to have prioritised or explored the scope of Buckinghamshire Council to help address MK’s substantial unmet need. This is despite the fact that this unmet need was made public as early as MK’s Regulation 18 Local Plan in July 2024 and as set out in MK’s “Ambitions and Objectives Consultation” in January 2023:

*“There is a requirement for local authorities and certain specified public bodies to cooperate with each other (known as the ‘duty to cooperate’) in the preparation of local plans. The duty requires local authorities and other public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of their development plans in so far as they relate to strategic matters. We will continue to work with the relevant organisations to ensure that we meet the duty and that our plans work well together.”*

5.2.6 The strategy of active engagement with neighbouring authorities to ensure that unmet employment needs could be met was echoed in the Local Planning Authority’s Economic and Cultural Prosperity Topic Paper (July 2024):

*“...A major issue identified in this Topic Paper is Milton Keynes is unable to accommodate forecasted needs for industrial and particularly warehousing floorspace over the plan period. Through the Regulation 18 consultation the Council will consult over how it should deal with this issue and if any developer /land owner wishes to promote land for warehousing.”<sup>1</sup>*

*“...But no obvious large-scale sites for such development have been identified and only a limited number of city expansion sites have been promoted for employment land uses through the call to sites. Our options for meeting this shortfall and mitigating risks to the MK City Plan 2050 include through Duty to Co-operate meetings, requests to neighbouring local authorities to accommodate our needs, and consult on how we deal with warehousing in the future including inviting further promotion of land for warehousing through the Regulation 18 consultation.”<sup>2</sup>*

<sup>1</sup> Milton Keynes Council, Economic and Cultural Prosperity Topic Paper, July 2025 (para 8.2)

<sup>2</sup> Milton Keynes Council, Economic and Cultural Prosperity Topic Paper, July 2025 (para 6.14)

- 5.2.7 More recently, in January 2025, the refreshed MK Strategy for 2050 explicitly recognised that Milton Keynes ought not to be understood merely as the land within the Council’s administrative boundaries, but also included land in neighbouring authorities:

*“This Strategy for 2050 is about the future development of Milton Keynes borough, but we have also thought about the wider area and economy because people travel across council boundaries for day-to-day access to work, shops, leisure and other services. [p. 12]*

*“We think of this area as a ‘Greater’ Milton Keynes that covers the immediately neighbouring parts of Northamptonshire, Buckinghamshire and Central Bedfordshire. [p. 12]*

*“This Strategy for 2050 does not specify development sites in our neighbouring areas; we know that is a decision for the relevant councils and that any homes built are counted towards their housing targets. But we have considered how development might work best across boundaries, especially when thinking about how people move around for work and their day-to-day needs and which areas are likely to continue grow over the coming decades. [p. 7]*

*“Beyond our city boundary are other sensible locations for long term growth... The east-west corridor to the south of the city and into north Buckinghamshire and Central Bedfordshire will benefit from new rail services as part of East-West Rail...Proposals in areas beyond the Milton Keynes boundary are outside the remit of this Strategy but we hope to work closely with our neighbouring councils to develop joint proposals for growth that reflect the economic, social and physical links across our formal boundaries [p. 37]*

*“The logistics industry will continue to need large, flat sites that have good links to the transport network. We may see a continued need for large floorplate warehouses to stockpile goods in case supplies of goods are disrupted in future, as happened during the COVID-19 pandemic. [p. 43]”*

- 5.2.8 The document even goes as far to state on p. 28 that “Local authority boundaries are arbitrary when it comes to landscape features and habitats,” and that (p. 83) that they “believe there are ways that neighbouring councils can work together in a positive way through existing and new arrangements without the need to change local authority boundaries.”
- 5.2.9 According to their own schedule of meeting dates, the Council has not engaged on an ongoing basis. For example, there was one meeting within North Northants in 2022, and two each with West Northants (2023 & 2024) and Bedford (2022 & 2024).
- 5.2.10 The extent of the Council’s unmet employment need was made public via the Regulation 18 consultation which ended on 9<sup>th</sup> October 2024. Since then, the Council has met neighbouring authorities a total of four times: two with Central Bedfordshire in July 2025, and one meeting apiece with Buckinghamshire (May 2025) and West Northants (November 2024). This is not meaningful, constructive engagement, and it is concerning that there does not seem to be any active or ongoing engagement at this stage of the plan-making process.
- 5.2.11 The Council must, in order to submit a Plan that is capable of being found sound under examination, ensure it prepares a Plan that puts forward an effective strategy for meeting its needs. This should, under the national policy, involve co-operation with neighbouring authorities.
- 5.2.12 Milton Keynes itself recognises throughout its evidence base and economic development strategies that there is insufficient land within its own boundary to meet its identified employment needs. The Council therefore needs to identify a clear strategy for meeting this need through land in neighbouring authorities and for this to be reflected in an updated version of the draft Local Plan prior to submission for Examination. This should include strong support for the delivery of development beyond Milton Keynes’ boundary that meets its unmet need including for employment land. The Plan should also include direct reference to the potential for the settlement to grow to the

South (in Buckinghamshire Council) including the potential of the Site as one of the most sustainable development options for the delivery of employment land to help support growth – and address need – within Milton Keynes.

5.2.13 The extent to which Milton Keynes is constrained is illustrated in the aerial image below, which shows clearly that the settlement boundary of MK is completely constrained by Flood Zones to the north and east and that all available land is either allocated or submitted for an emerging allocation in the Local Plan. The settlement is too constrained to accommodate the city’s expansion within the local authority’s own borders, and for that reason, there needs to be greater co-operation within authorities such as Bucks prior to submission and examination of the Plan, as well as recognition within MK’s draft Local Plan that development of the land to the south of MK would be supported should it address unmet need. The Council should, as a formal policy position with the draft Plan, proactively support development proposals that seek to address MK’s unmet need as a matter of principle.

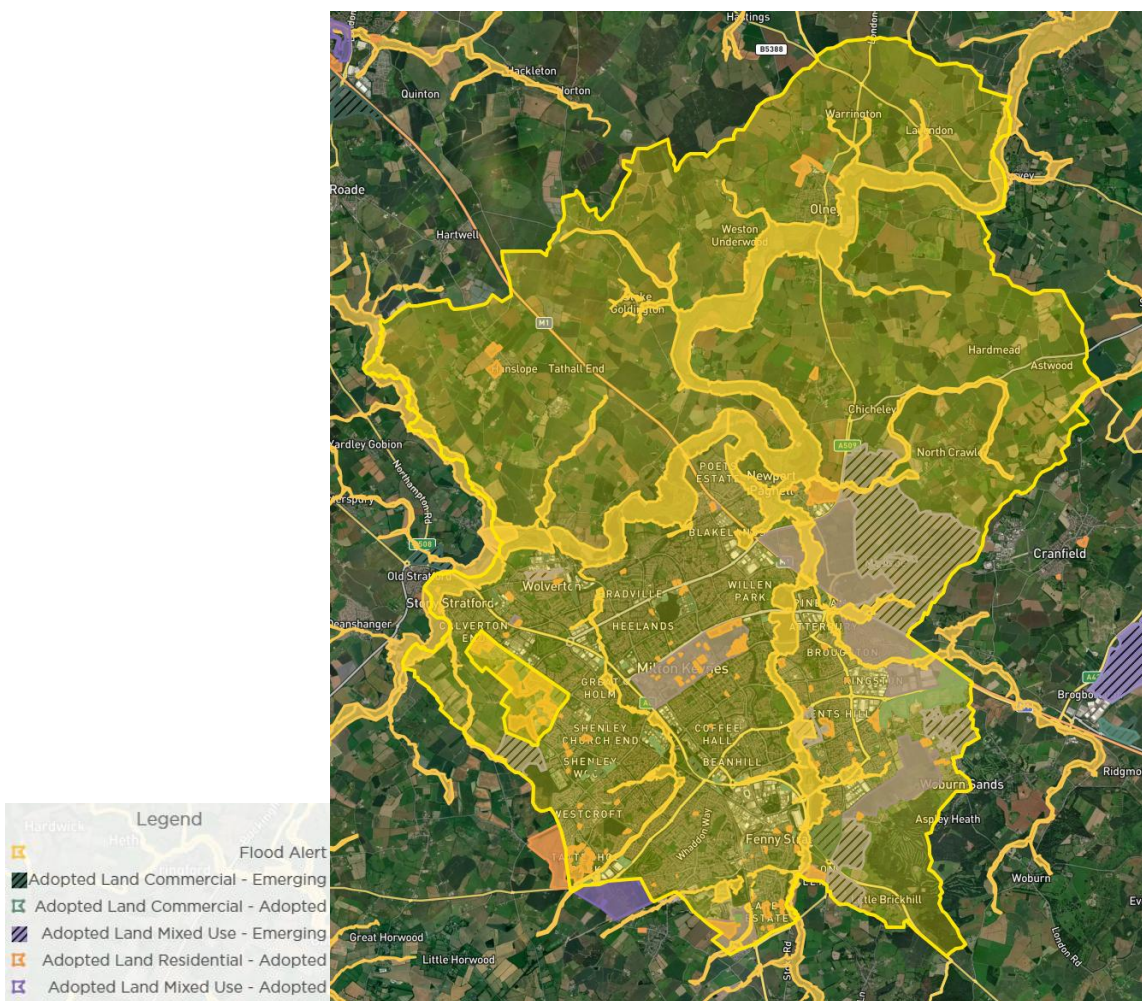


Figure 4: Constraints and Sites in MK (Source: Savills Maps)

## 6. Sustainability Appraisal

### 6.1 Summary

6.2 The Sustainability Appraisal (SA) is dated October 2025 and was prepared by Aecom. It assesses the various growth scenarios (including the preferred option), and offers an appraisal for the Plan's approach. Key paragraphs relating to employment are quoted below, with Savills emphasis underlined:

*"With regards to omission sites (i.e. site options that do not form part of the identified supply), there is clear 'top down' pressure to consider the possibility of additional allocations given the technical shortfall in respect of employment land supply as measured against identified need (433 ha – 210 ha = 223 ha). [5.3.24]*

*However, the shortfall is in respect of land for warehousing and distribution / logistics, and it is important to note that the industry is somewhat footloose such that there will be good potential for unmet needs to be provided for elsewhere in the subregion to good effect. This could well include locations outside of the City Council's boundary on the wider Strategic Road Network, and potentially in close proximity. [5.3.25]*

*[T]here is a very significant unmet need for warehousing and distribution ('logistics') floorspace, which precludes the potential to predict significant positive effects here, but there are no reasonable options for boosting supply, at least through new allocations. [6.8.2]*

*Having made these introductory remarks, the key point to note is that none of the variable growth locations would be likely to deliver significant new employment land. [6.8.4]*

*However, the growth strategy may help to deliver transport infrastructure upgrades that could help to unlock employment land options in Central Bedfordshire. [6.8.6]*

*With regards to significant effects, whilst the strategy is considered proactive there is technically an unmet need. [6.8.6]*

*The appraisal in Part 1 predicts a 'moderate or uncertain' positive effect for Scenario 5, but this is with much uncertainty as it is difficult to know what weight to put on the significant technical undersupply in respect of warehousing and distribution floorspace. [9.8.1]*

*Given the challenges that existing [sic] in respect of finding new sites for warehousing and distribution, the proposed policy approach to supporting the redevelopment of existing employment sites takes on considerable importance. Options include policy support for:*

- o Redeveloping older industrial/warehouse sites with taller buildings to increase the amount of warehouse floorspace.*
- o Amalgamation of sites and replacement of older existing industrial /warehouse buildings to create a warehouse on a bigger site.*
- o Refurbishment of older existing buildings for warehousing, but I think the scope for that would be limited because of the need to accommodate new technology." [6.8.2]*

## 6.3 Comment

- 6.4 Ultimately, the conclusion of the SA in the context of employment need is that there is not enough land supply to meet demand, and that this results in an economic strategy that has ‘moderate or uncertain’ positive effects, and that it is not possible to establish what impact the ‘significant technical undersupply’ of logistics floorspace will have, but suggests that this is worth considering as a ‘significant effect.’
- 6.5 The attempt to address this shortfall is made by efforts within the Plan to make the best use of existing employment land through redevelopment, but the SA does not explain that this is unlikely to help substantially address the unmet need. This proposed approach is insufficient for a number of reasons, including that the potential to deliver a significant uplift in floorspace is limited. Relying on intensification and the redevelopment of existing sites will take considerable time and likely only make a limited contribution to addressing need.
- 6.6 The SA also suggests that there are some development options that could help unlock employment land options in Central Bedfordshire, but declines to note that there are other sites which can come forward without the need for such enabling development. Land South of MK, which is adjacent to MK’s settlement boundary, and therefore sustainably located close to an existing labour supply, is such a site. It also fulfils the sorts of criteria that paragraph 5.3.25 hold up as a sustainable option: it is outside of the City Council’s boundary, on the wider Strategic Road Network, and in close proximity.
- 6.7 Land South of MK ought, on this basis, to be explored as a site capable of making a meaningful contribution to the Council’s unmet employment requirements prior to the submission and examination of the draft Local Plan. The Plan ought also to support in principle the delivery of sites outside MK’s administrative boundaries that seek to meet MK’s unmet needs as set out within these representations.

## 7. Conclusion

- 7.1 Richborough Commercial is supportive of Milton Keynes proceeding with the preparation of a Local Plan as it is important that Local Planning Authorities plan proactively for development to meet a wide range of needs over the plan period. However, these representations explain the concerning approach being undertaken by the Local Planning Authority and the Local Plan as drafted is not 'sound'.
- 7.2 Of considerable concern is that the evidence base for the plan identifies there is a significant need for employment land in Milton Keynes, however the Local Planning Authority is ignoring this evidence to make provisions for a smaller proportion of need. In order to be found sound, the Plan should be robustly assessed in the context of Duty to Cooperate best practice with best endeavours made by Milton Keynes to agree with adjacent Local Planning Authorities that unmet need will be taken up by other Local Planning Authorities including Buckinghamshire Council who are preparing their own Local Plan at the time of writing.
- 7.3 Despite there being limited evidence of Milton Keynes working proactively with its neighbours, the Council has drafted Policy GS11 relating to planning applications submitted on land beyond its boundaries (such as in Buckinghamshire Council). This indicates Milton Keynes is intending to be a key stakeholder for such planning applications.
- 7.4 The settlement of Milton Keynes is constrained with geographical and administrative limitations on its growth potential, so in the spirit of preparing a sound plan it is important for Milton Keynes to acknowledge the potential of land beyond its boundary to deliver development. Owing to much of the land around Milton Keynes being constrained by flood risk and other technical issues, the logical direction of growth for Milton Keynes is to the south. This is reinforced by long term development plans in this location including East West Rail. In the spirit of positive plan making, we request more detailed negotiation with adjacent Local Planning Authorities including Buckinghamshire to prepare a plan that is capable of being found sound.
- 7.5 In order to support the examination and future adoption of the Plan, Richborough Commercial request amendments to the Plan to improve its prospects of the Plan being considered sound. This includes, as set out above, revisions to draft policies and a new policy that establishes the Council will be supportive of development in neighbouring authorities that can make a contribution to the Council's unmet need. We would be grateful to have an opportunity to discuss these representations with Milton Keynes in due course.

# Appendix A Savills Industrial and Logistics Need Assessment

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# MK City Plan 2050 Regulation 19 Consultation

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Industrial & Logistics (I&L) Needs Assessment

Prepared for Richborough Commercial

December 2025

The Savills logo consists of a solid yellow square positioned above the word "savills" in a lowercase, sans-serif font. The text is white, creating a high-contrast look against the yellow background.

savills



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## 1. Introduction & Key Findings

- 1.1.1 The report is submitted for the MK City Plan 2050 Regulation 19 consultation. It has been prepared by Savills Economics on behalf of Richborough Commercial who are promoting the Land South of the A4146, known as Richborough Park – MK South (the Site) in Buckinghamshire for Industrial and Logistics (I&L) development<sup>1</sup>.
- 1.1.2 The report considers the identified shortfall in I&L land and premises in Milton Keynes over the period of the emerging local plan. It also demonstrates how the Site is ideally positioned to address this shortfall due to its location and characteristics.
- 1.1.3 The key findings of this report are
- The draft MK City Plan 2050 clearly demonstrates that the Council is unable to meet its I&L land needs within its own administrative boundaries. It has a shortfall of at least 160ha although it is highly likely to be considerably more.
  - Milton Keynes has strong spatial and economic links with its neighbours and urgently needs to re-engage with Buckinghamshire and other neighbouring local authorities, prior to the Submission and Examination of the emerging plan, to identify those sites best placed to help meet its needs, including those outside its own boundaries. Its status as a Renewed Town to accommodate massive growth makes the need for engagement even more pressing.
  - Without substantive engagement with its neighbours, Milton Keynes runs a risk that its Examination in Public will be paused because the Planning Inspectorate requires it to find additional sites for employment. This recently happened to Sheffield City Council in which it needed to find an additional 53ha of employment land. This delayed the examination process by approximately eight months.
  - Milton Keynes' functional economy extends beyond its boundaries. Market signals and spatial analysis demonstrate that the I&L market in the wider Milton Keynes Growth Area is increasingly integrated.
- 1.1.4 The Site is well placed to meet Milton Keynes' need for additional land for I&L premises because of its location within Milton Keynes' Growth Area, its functional links with Milton Keynes, and its considerable development capacity. As a result of these findings, Milton Keynes City Council are encouraged to engage with Buckinghamshire Council as part of the preparation of its emerging local plan. In particular, to discuss how the Proposed Development of new I&L units in **Figure 1.1**, situated on the boundary with Milton Keynes, can help meet a portion of its unmet employment needs.
- 1.1.5 The Site is approximately 46 hectares in size and is immediately adjacent to Milton Keynes' boundary within Buckinghamshire. It sits within the Milton Keynes Growth Area and has the capacity and access to meet Milton Keynes' need for additional I&L land and premises. In particular, the Site benefits from good road connectivity including to the M1

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<sup>1</sup> Savills define I&L premises as those that are within the light industrial (E(g)(iii)), general industrial (B2) and storage & distribution (B8) use classes.

and rail connectivity via East-West Rail at Bletchley.

- 1.1.6 Figure 1.1 is an indicative masterplan. It shows the local authority boundary on the north side of the Site (i.e., the purple line).

Figure 1.1 – Subject Site & Proposed Development



Source: Richborough Commercial, 2025

## 2. Milton Keynes' evidence base reveals a shortfall of at least 160ha of land for I&L premises over the plan period (2022-2050)

- 2.1.1 The draft MK City Plan 2050 includes discussion of the Council's need for I&L premises over the plan period. It says that as of 2023, the logistics sector exhibited strong growth and is considered a key growth driver for the local economy. More than 9% of the local workforce was employed in the sector which is well above the national average of 5%. It also notes that the opportunity for the sector's further growth in Milton Keynes is limited due to a lack of suitable sites.
- 2.1.2 The draft MK City Plan 2050 identifies a total net requirement for 1.31m sq.m (14.1m sq.ft) for I&L premises. This is equivalent to a requirement of 367ha for I&L land. About 310ha (nearly 85%) of the demand is for warehousing and logistics. This need is highlighted in **Table 2.1**.
- 2.1.3 The draft MK City Plan 2050 identifies 207.5ha of new employment land to meet its needs (Table 4 of the draft plan). Most of the sites are characterised as having flexible uses for R&D (primarily an office use) as well as uses within the I&L sector. Even if all the identified employment land were set aside purely for I&L uses (which is unlikely), Milton Keynes would have a shortfall of nearly 160ha. However, a proportion of this land will go for R&D, offices and other non-I&L uses. There is also considerable demand for employment land from data centres which have been designated Nationally Significant Infrastructure Projects. These applications are fast-tracked and determined by the Secretary of State. Data centres fall within the B8 Use Class but are distinct from traditional I&L premises and don't help to meet the I&L need identified in the Council's evidence base. Therefore, the shortfall for I&L land is highly likely to be considerably greater than 160ha.
- 2.1.4 **Table 2.1** summarises Milton Keynes' I&L land deficit and underlines the challenge of securing sufficient land for its burgeoning I&L sector.

**Table 2.1 I&L Land Deficit Over Draft Plan Period (2022-2050)**

<b>Total Land Supply for E(g)i-iii, B2, and B8</b>	<b>207.5</b>
Net Requirements (after deducting for completions and commitments)	
<i>Industrial (E(g)iii and B2)</i>	<i>(57)</i>
<i>Warehousing &amp; Logistics (B8)</i>	<i>(310)</i>
<b>Total Net Requirement for I&amp;L</b>	<b>(367)</b>
<b>Minimum I&amp;L Land (Deficit)*</b>	<b>(159.5)</b>

\* This assumes that all of the 207.5ha of new employment land is for I&L. It is unlikely that all of this will come forward for I&L. Therefore the I&L deficit, indicated by parentheses, is highly likely to be significantly greater than 160ha.

Source: MK City Plan 2050

- 2.1.5 The emerging plan says *‘if suitable development sites are not available in Milton Keynes, developers will seek to develop sites where suitable sites are available’* (paragraph 38). This is a passive stance by Milton Keynes and is insufficient to ensure that the Council will have enough I&L land to meet its needs. Alternatively, Milton Keynes should state that it will proactively engage with neighbouring authorities to ensure suitable sites are available.
- 2.1.6 The draft MK City Plan 2050’s Policy GS11 Adjacent and Cross-Boundary Growth references the need to consider economic growth on its boundary. Whilst the inclusion of the policy demonstrates the Council’s recognition that some of its economic growth needs to be facilitated by its neighbours, the policy is drafted in a way that puts the onus entirely on the other local authorities to delivery sustainable growth. This policy should be written in a manner that indicates that Milton Keynes will positively engage with its neighbours in finding suitable sites to help meet its needs. To do this, we recommend updating draft Policy GS11 so that it offers clear support for applications adjacent to Milton Keynes which respond to unmet need for employment uses (see section 4.2 of the planning representation). Without this positive planning, this need will remain unmet.

3. Milton Keynes' economic links with its neighbours is recognised in its evidence base. To meet its economic needs, the Council needs to leverage these links which we consider to be a soundness issue for the emerging Local Plan.

- 3.1.1 Milton Keynes is not an island. It operates within a wider Property Market Area (PMA), with strong functional links to its neighbouring authorities. Any consideration of the needs of its I&L sector should take account of this broader geography, especially given the Council identifies an I&L land shortfall.
- 3.1.2 Milton Keynes' evidence base references its strong links with its neighbouring local authorities. The most recent evidence base document to do this is the 2024 Housing and Economic Development Needs Assessment (HEDNA). The HEDNA illustrates Milton Keynes' cross-boundary linkages through maps. These are shown in **Figures 3.1** and **3.2**.
- 3.1.3 **Figure 3.1** presents the Milton Keynes Growth Area which extends beyond its boundary. It also shows the location of the Subject Site, demonstrating where it is situated. Whilst the Growth Area is not prescribed by a precise boundary, the map references the importance of the areas beyond Milton Keynes' administrative limits. The Growth Area encompasses parts of Buckinghamshire, Central Bedfordshire and West Northamptonshire local authorities.
- 3.1.4 The Milton Keynes Growth Area is comprised of an employment zone that is functionally linked to Milton Keynes' economy due to proximity, road access, and infrastructure. These links suggest that development proposals for employment premises in the Milton Keynes Growth Area beyond the Council's administrative boundary should be seen as contributing towards Milton Keynes' economic needs.
- 3.1.5 The strong functional links are also demonstrated through Milton Keynes' travel to work area which is presented in **Figure 3.2**. This is another illustration of how Milton Keynes' labour market extends beyond its borders and further underlines the fact that any new employment premises delivered in the Milton Keynes Growth Area will draw its labour force from both within Milton Keynes and elsewhere.
- 3.1.6 Another factor to consider is that the Government's New Towns Taskforce recommended Milton Keynes for a new settlement in the northern part of the district that could deliver about 40,000 new homes. The new town would also have a new junction to the M1 motorway and a sustainable mass transit line to better connect Milton Keynes' different areas. If Milton Keynes' residential population is significantly increased without addressing the existing shortfall, it is highly likely that unsustainable commuting patterns would become more acute.

Figure 3.1 Milton Keynes' Growth Area Extends Beyond its Boundary

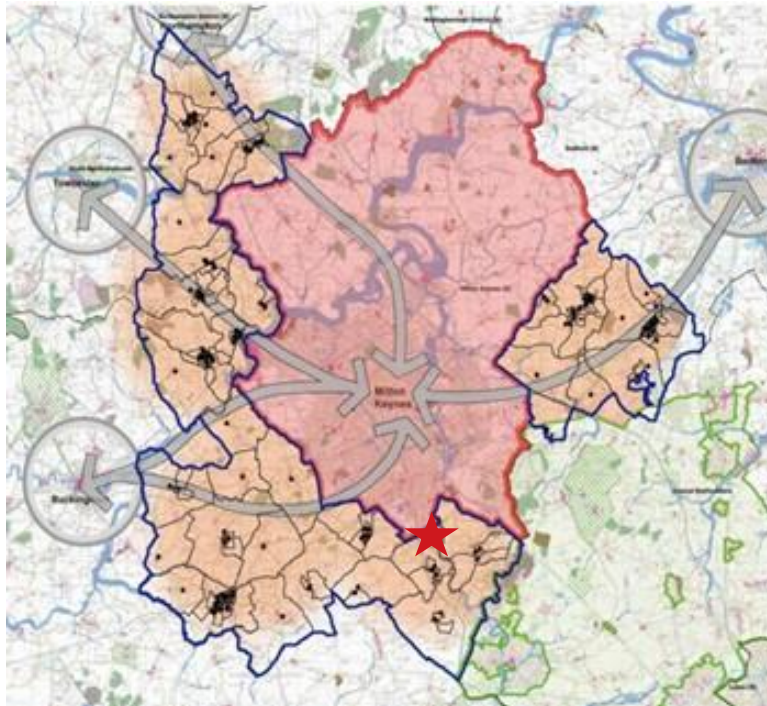
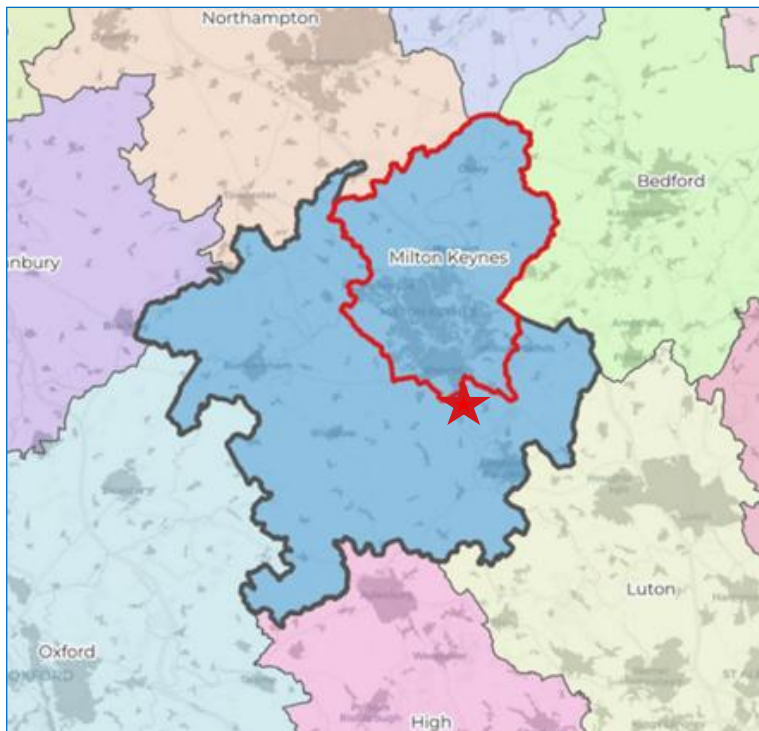



Figure 3.2 Milton Keynes Travel to Work Area Extends Beyond Its Boundary



Source: *Housing and Economic Development Needs Assessment (2024); Savills (2025)*

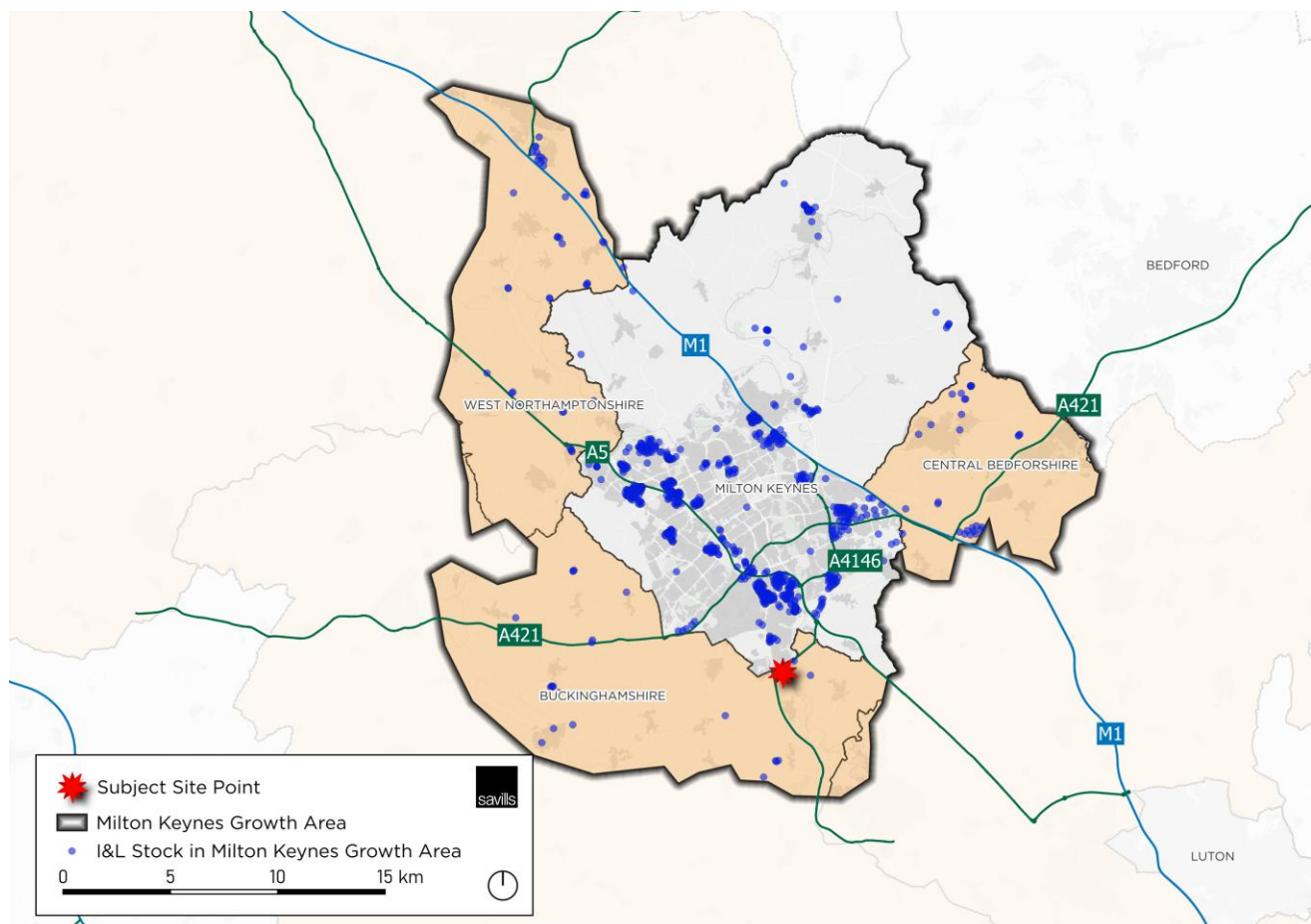
 Subject Site

## 4. Analysis of market signals demonstrates that the Milton Keynes Growth Area is the natural extension to Milton Keynes' I&L sector.

4.1.1 Our spatial interpretation of the Milton Keynes Growth Area is presented in **Figure 4.1**. This, along with other analysis in this section, demonstrates that the Milton Keynes Growth Area provides an important spatial zone for the Council to address its I&L land shortfall.

4.1.2 As set out in the 2024 HEDNA, the Milton Keynes Growth Area extends into Buckinghamshire, Central Bedfordshire and West Northamptonshire. **Figure 4.1** shows the clusters of existing I&L stock within the Milton Keynes administrative area. They are primarily along the A5 corridor and along the M1 motorway. It also highlights the considerable potential land capacity within the wider Milton Keynes Growth Area.

**Figure 4.1 Milton Keynes Growth Area**



Source: Savills, *Housing and Economic Development Needs Assessment*

4.1.1 **Table 4.1** sets out the broad market metrics for Milton Keynes and the wider Milton Keynes Growth Area. The area beyond Milton Keynes' administrative boundary

represents about 11% of total I&L stock and about 19% of delivery in the past 10 years equating to 425,000 sq.m (gross) of I&L floorspace. As I&L land within Milton Keynes has diminished, more development has been taking place beyond its borders. Combined with the closely aligned rental values, this points to an increasingly integrated market where occupiers and developers view the wider Milton Keynes Growth Area as a single functioning I&L market.

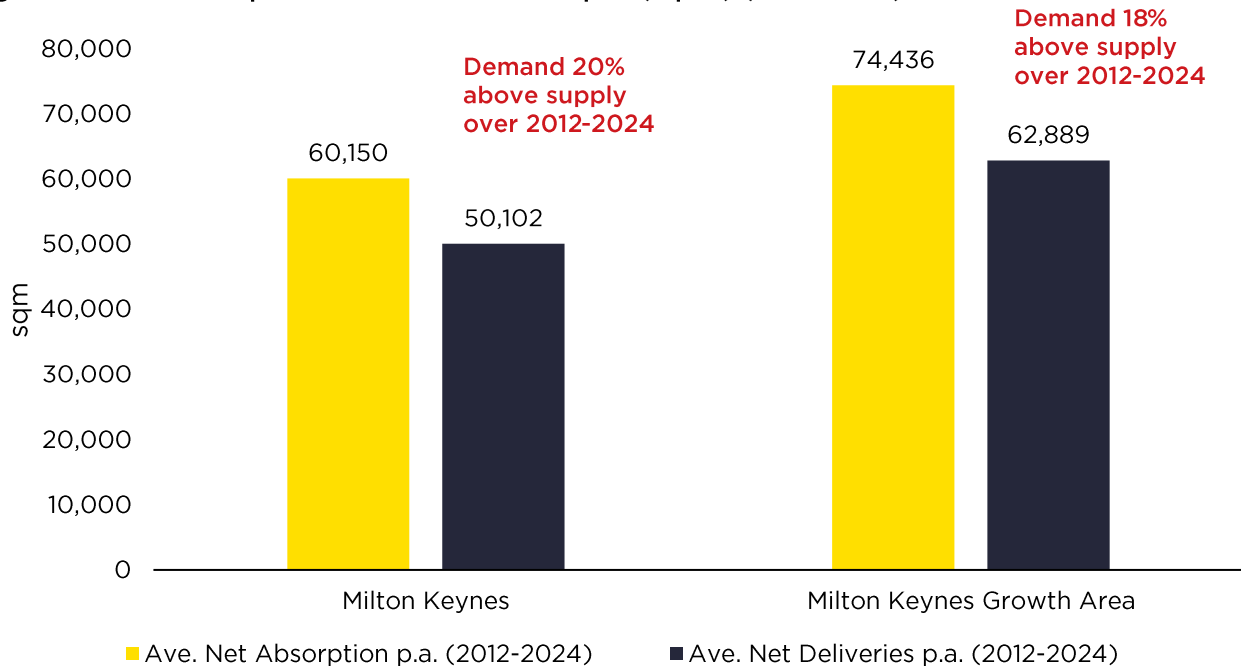
	<b>Inventory (2025 YTD) (Sq. m)</b>	<b>Net Change in Inventory (2015 to 2025 YTD) (Sq. m)</b>	<b>Average Asking Rent (2025 YTD) (Per Sq. m)</b>
Milton Keynes	3,443,925	555,803	£135.00
Milton Keynes Growth Area	425,558	132,153	£130.00

Source: CoStar (2025)

***I&L demand exceeds supply in Milton Keynes and the Milton Keynes Growth Area***

- 4.1.2 Net absorption is a leading measure of demand based on leasing activities. It compares occupied space (move-ins) versus vacated space (move-outs). Net deliveries, on the other hand, is a measure of supply and registers the change in inventory (floorspace) related primarily to new developments.
- 4.1.3 **Figure 4.2** shows that over the historic time series, average levels of net absorption have exceeded the average levels of net deliveries (supply) of I&L floorspace in Milton Keynes and the Milton Keynes Growth Area by 20% and 18%, respectively. This imbalance illustrates an increasingly constrained market and helps explain the deficit in I&L land in the period (2022-2050) of the emerging local plan.

**Figure 4.2 Net Absorption and Net Deliveries p.a. (sq. m) (2012-2014)**

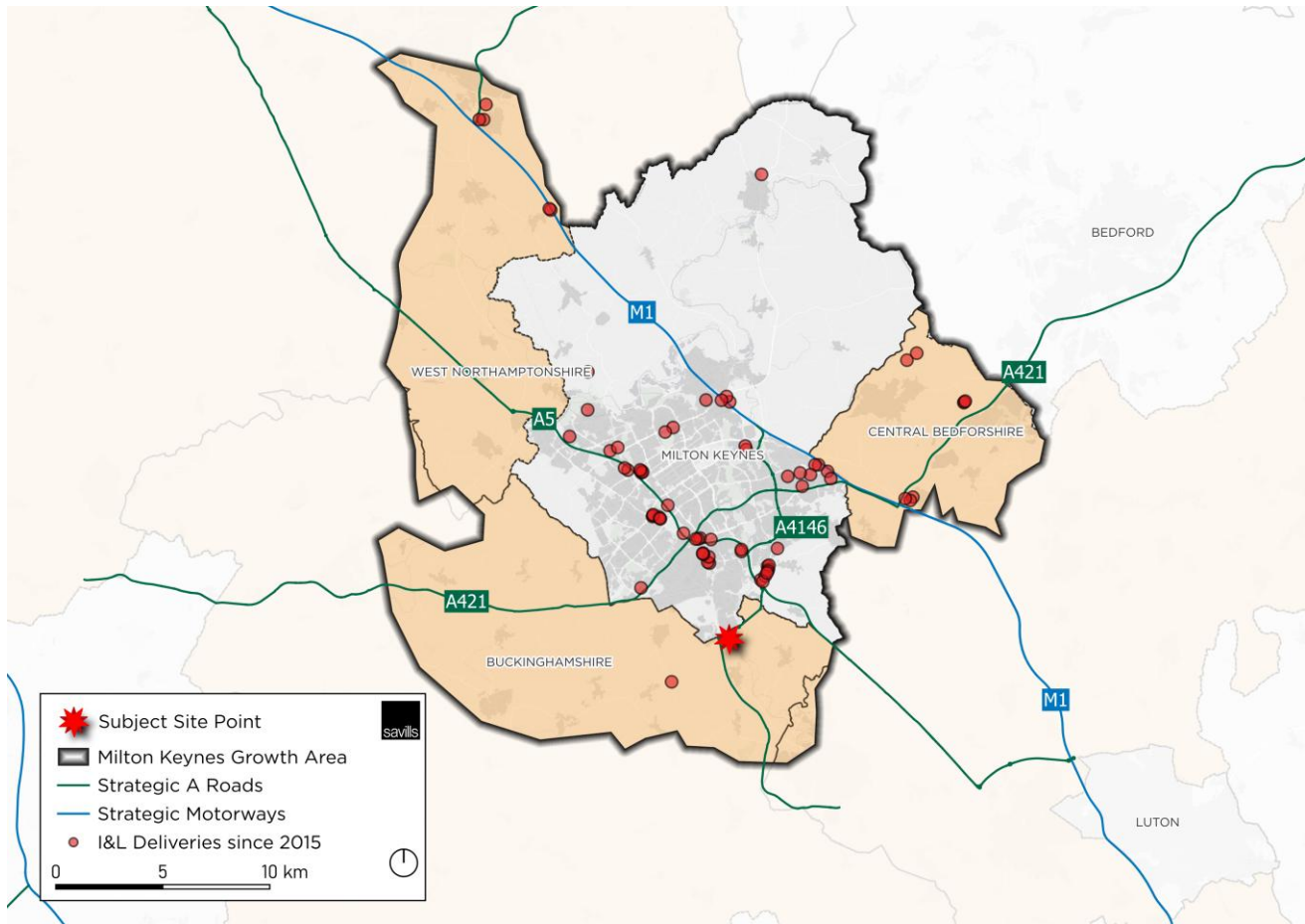


Source: Savills, CoStar (2025)

### ***Increasing I&L Market Integration***

4.1.4 **Figure 4.3** illustrates the spatial distribution of new I&L premises across Milton Keynes and the Milton Keynes Growth Area that have been completed since 2015. New I&L development activity has not been confined to Milton Keynes’ administrative boundary but is extending along strategic corridors and into the wider area, reinforcing how the market operates as a single integrated geography. The Subject Site sits within this established pattern of growth and can play a key role in addressing the I&L land deficit.

Figure 4.3 Spatial Distribution of I&L Deliveries in the Milton Keynes Growth Area Since 2015



Source: Savills, CoStar (2025)

### 5. The Site is characterised by its strategic location that can contribute towards Milton Keynes' I&L floorspace needs.

5.1.1 The Site represents an important cross-boundary opportunity for Milton Keynes. Its delivery would contribute towards the Council's identified I&L need and wider economic objectives. **Figure 5.1** shows that the Subject Site is a natural extension of the Milton Keynes administrative area.

**Figure 5.1 Subject Site's Spatial Dynamic with Milton Keynes**



Source: Savills, 2025

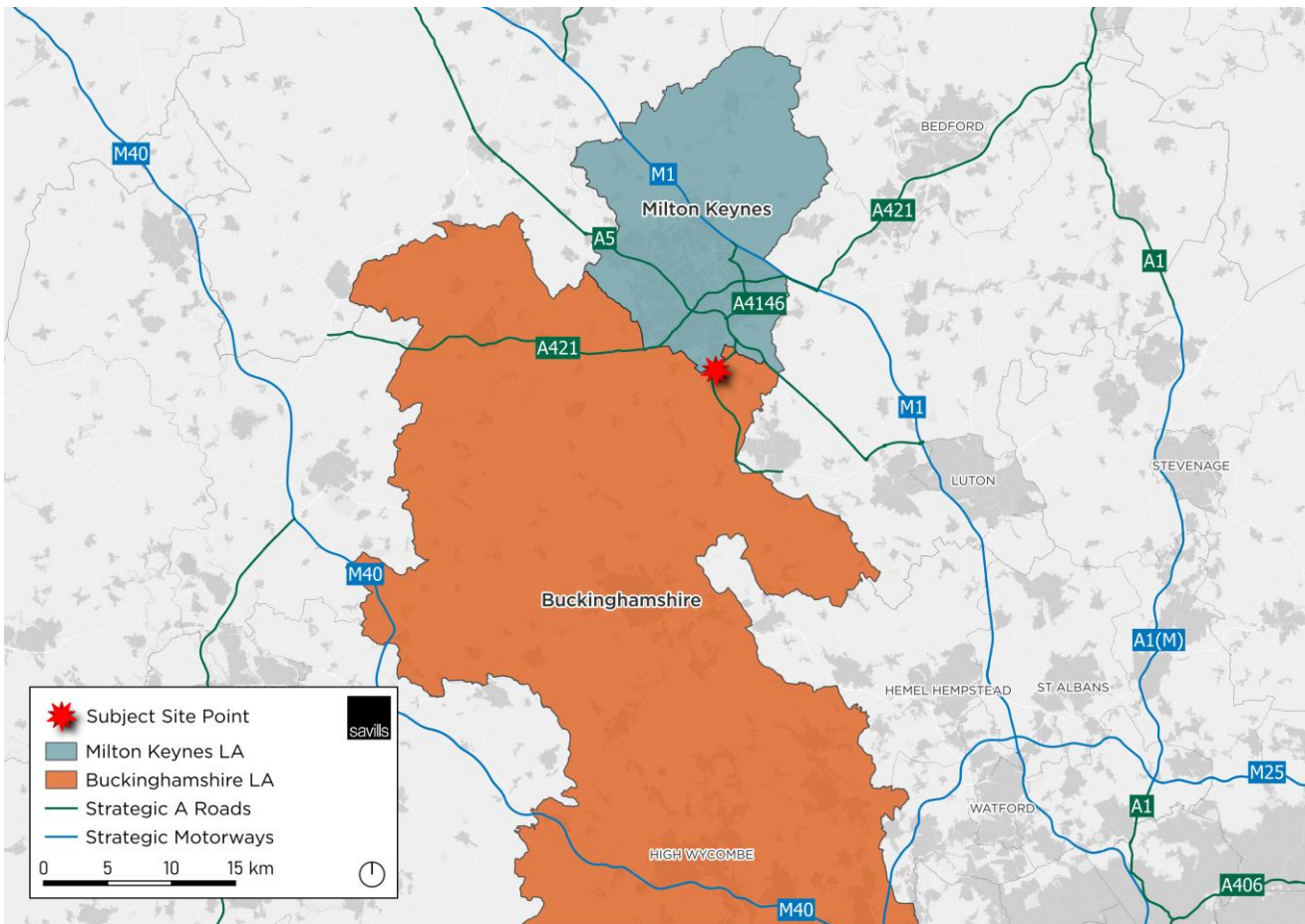
5.1.2 The Subject Site's location benefits from a number of strategic advantages which make it a prime opportunity to meet Milton Keynes' I&L shortfall.

#### ***Good Accessibility to the Strategic Network***

5.1.3 It benefits from its strategic connectivity through Milton Keynes and its surroundings. **Figure 5.2** shows how the Site is adjacent to the A4146 and in close proximity to both the A5 and the A421. These movement corridors not only provide access to the regional and national movement corridors but also provide good access to Milton Keynes' consumer

market and City Centre.

**Figure 5.2 Road networks providing access to Milton Keynes from the Site**



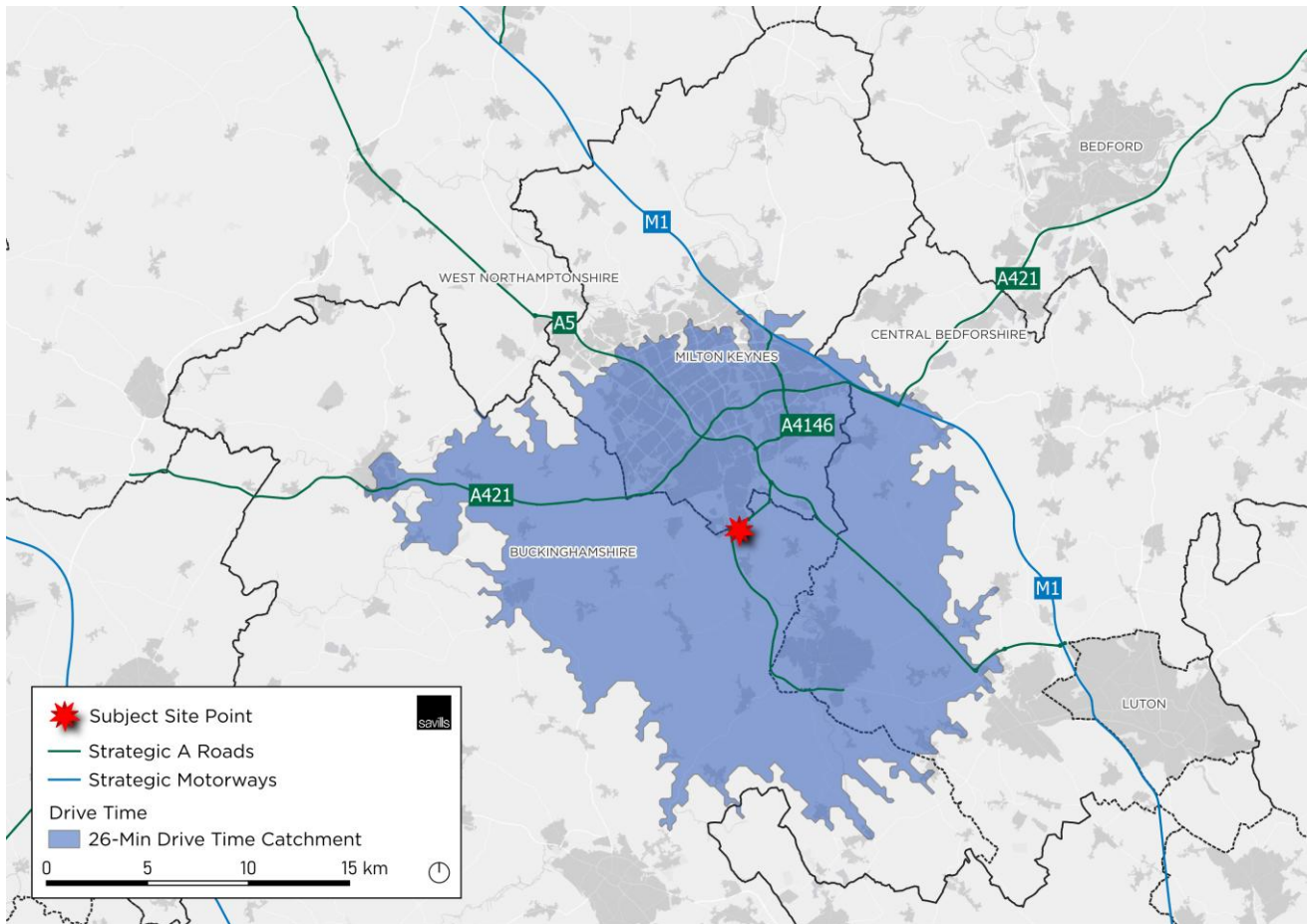
Source: DfT, Savills 2025

### ***Access to Labour; Creating Employment for Milton Keynes Residents***

5.1.4 The Subject Site would generate employment opportunities for Milton Keynes residents. We consider a 26-minute drive catchment to be appropriate for assessing labour accessibility (this is shown in **Figure 5.3**). This is the average home-to-work travel time for Milton Keynes<sup>2</sup>. Within this catchment, there are approximately 218,000 people of working age (aged 16-64). Approximately 143,000 are residents of Milton Keynes. This represents an opportunity to create employment opportunities for Milton Keynes residents. Some people in Milton Keynes would be willing to travel further than the average drive to work time, or may use other methods of transport such as public transport (including East-West Rail). This means that the Site' accessibility for Milton Keynes residents could be higher than the 143,000 residents.

<sup>2</sup> ONS User Request Data - 2018: TRVTME Usual home to work travel time (minutes) by local authority

Figure 5.3 26-Minute Car Drive Catchment from the Subject Site



Source: Savills 2025

- 5.1.5 The preceding spatial analysis clearly demonstrates how the Subject Site represents a significant cross-boundary opportunity for Milton Keynes to address its shortfall in I&L employment land.
- 5.1.6 Substantive engagement with its neighbouring local authorities can ensure Milton Keynes is able to secure support to meet its unmet employment land needs. The Site can play a pivotal role in meeting this identified shortfall and supporting the wider economic growth objectives of the draft MK City Plan 2050.

## 6. Conclusions

- 6.1.1 This report has made the case for the Site as an ideally situated site for I&L development on the boundary with Milton Keynes in Buckinghamshire. The need for the Site is made clear through the draft MK City Plan 2050, which reveals the Council's shortfall of at least 160ha is needed for its I&L sector. However, the shortfall is likely to be considerably more due to demand from other sectors, including data centres.
- 6.1.2 The report has shown through spatial analysis and a high-level review of market signals that Milton Keynes' I&L market has strong spatial and economic links with its neighbours. Given the shortage of I&L land within the administrative boundary of Milton Keynes, the Council urgently needs to engage with Buckinghamshire and other neighbouring local authorities, prior to the Submission and Examination of the emerging plan, to identify sites that can help it meet its I&L land needs. Engagement needs to be an even greater priority now that Milton Keynes has been designated a Renewed Town and could potentially accommodate an additional 40,000 new dwellings.
- 6.1.3 Without substantive engagement with its neighbours, Milton Keynes is at risk of its Examination in Public being derailed because it has not meaningfully engaged with its neighbours to address its I&L land shortfall. This recently happened to Sheffield City Council in which the EiP was paused so that the Council could find an additional 53ha of employment land.
- 6.1.4 The Site that has been presented in this report is ideally located to help address Milton Keynes' need for additional land for I&L premises. This is because of its location within Milton Keynes' Growth Area, its functional links with Milton Keynes, and its considerable capacity.

Mark Powney

David Wasserberg

Gabriel Fernandes

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# Appendix B Savills Representations to Buckinghamshire Council Reg 18 Consultation

# Buckinghamshire Regulation 18 Local Plan Consultation

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Representations submitted on behalf of Richborough Commercial

October 2025



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# 1 Introduction

- 1.1.1 These representations are submitted on behalf of Richborough Commercial ('Richborough') who are promoting Richborough Park – MK South ('the Site'). The Site comprises approximately 46.06 ha of undeveloped land to the south of the boundary with Milton Keynes, and located within the Aylesbury Vale area of Buckinghamshire Council ('the Council'). The Site is being promoted for mixed use employment comprising Use Classes E(g)(iii), B2 and B8 with ancillary office areas.
- 1.1.2 Appended to these representations is an Industrial & Logistics (I&L) Needs Assessment (October 2025), prepared by Savills Economics. This reviews the economic evidence base that has been prepared to support the consultation documents, and provides an independent assessment of the anticipated level of demand within Buckinghamshire.

## 1.2 About Richborough

- 1.2.1 Richborough is the UK's leading independent strategic land promotion business, established in 2003. It aims to work responsibly and in partnership with landowners, local authorities and key stakeholders to bring forward land for development.
- 1.2.2 Richborough's projects are located throughout the country, ranging from schemes of around 100 homes to large strategic urban extensions for a mix of uses. With offices in Birmingham, Bristol, London, Manchester and Nottingham, the Richborough team comprises a blend of chartered industry professionals, including planners, surveyors, architects, urban designers, engineers and project managers. This makes Richborough well-equipped to accelerate the delivery of realistic, market-facing schemes.
- 1.2.3 Richborough oversees the entire planning process from start to finish. It identifies suitable opportunities, undertakes technical surveys, designs masterplans, promotes sites through local plans, secures outline planning permission and sells consented land to a range of development partners, from SME builders to large PLC developers. To date, the land it has promoted has delivered over 30,000 new homes.
- 1.2.4 Richborough is also a founding member of the Land, Planning and Development Federation (LPDF) and a proud member of the British Property Federation (BPF) and Home Builders Federation (HBF).

## 1.3 Richborough Commercial

- 1.3.1 Richborough Commercial is the commercial development arm of strategic land promoter, Richborough. It specialises in accelerating the delivery of land for employment-generating uses, including industrial and logistics, data centres, retail, roadside schemes and mixed-use developments.
- 1.3.2 Richborough Commercial is currently promoting over 17 million sqft of floorspace in well-connected and sustainable locations, including those close to key motorway junctions, along major road corridors and within easy reach of airports, ports and rail freight terminals. It targets sites where a demonstrable need for additional employment land and job creation exists and takes account of local consumers, labour and supply chains.
- 1.3.3 Richborough Commercial takes a bespoke approach to promoting each opportunity,

tailored to the local and wider strategic context within which the site is situated. It can flex its approach to meet the aspirations of local authorities and other stakeholders while responding to growing demand arising from both established and emerging sectors and changing market conditions, including interest from prospective developers and potential future occupiers.

- 1.3.4 As well as being a strong advocate of high-quality urban design and placemaking, Richborough Commercial prides itself on leaving a lasting legacy for future generations by creating additional local training and employment opportunities. It has worked within the commercial sector for many years, promoting multiple sites across the country and seeing them built out by development partners and successfully occupied by local and national employers.
- 1.3.5 For further details, please visit [www.richborough.co.uk](http://www.richborough.co.uk).

## 2 Richborough Park – MK South

### 2.1 Introduction

- 2.1.1 The site is being submitted as part of the Call for Sites aspect of the consultation process for a mixed use and flexible employment site of 46.06 ha. Current indicative masterplanning work suggests that the Site is capable of delivering around 127,645 sqm (1,373,959 sq ft) of employment floorspace.

### 2.2 Site Description

- 2.2.1 The Site is approximately 46.06 ha in size and is currently in agricultural use. Running alongside (but outside) its western boundary is a railway line, and it is bordered on the north and west sides by the A4146. This road is located within Buckinghamshire Council, but to the immediate north of it is the boundary of Milton Keynes City Council and established residential development.
- 2.2.2 To the west of the site, beyond both the railway line and the A4146 is land that is currently subject a pending outline planning application submitted by Richborough for 290 homes (ref. 24/03601/AOP). The application was validated 2 December 2025, and an appeal was lodged against non-determination on 4 August 2025 (ref. APP/J0405/W/25/3370338). We anticipate a hearing will be held on 9 December with a target decision date of 31 January 2026.
- 2.2.3 To the east of the Site is Stoke Road, along the other side of which is scattered development across a range of uses including sui generis and institutional residential. To the south of the site is additional agricultural land, beyond which is the village of Stoke Hammond.
- 2.2.4 There is a PRow (code SHA/2/1) running north-south along the western boundary that connects the Site to both Milton Keynes to the north (via an underpass) and Stoke Hammond to the south. This connects along an access track via a bridge over the railway line and underpass underneath the A4146 to a PRow bridleway to the west (code SHA/8/4), which provides a further connection to Milton Keynes to the west through the residential scheme being promoted by Richborough under planning application 24/03601/AOP mentioned above.
- 2.2.5 To the north of the Site, and stopping at Bletchley Railway Station, is the East West Rail line that runs between Oxford and Cambridge via Bicester, Milton Keynes, and Bedford. The under-construction route currently extends from Oxford to Milton Keynes. The Site also has links to the Redways cycle network at Lomond Drive on the north side of the A4146.
- 2.2.6 The Site is not subject to any policy designations or allocations, and is therefore ‘white’ land. Land to the east is designated as an ‘Attractive Area of Landscape’ (AAL) in the Vale of Aylesbury Local Plan (adopted September 2021). The site is within Flood Zone 1. An extract of the enclosed Wider Context Illustrative Masterplan is reproduced below showing the Site in context.



Figure 1: Wider Context Illustrative Masterplan

**2.3 Proposed Development**

- 2.3.1 The site is being promoted for a landscape-led, mixed use, flexible employment site capable of making a meaningful contribution to unmet employment need within Buckinghamshire and Milton Keynes. It will deliver space that is suitable for meeting modern occupier requirements, and includes provision of units in excess of 9,300 sqm (100,000 sq.ft.). As set out in the appended I&L Needs Assessment, there is a structural shortage of units of this size within the local area.
- 2.3.2 The landscape-led nature of the scheme will respond sensitively to surrounding context, including the historical village of Stoke Hammond to the south, and the woodland and River Ouzel to the east, as well as the wider ‘Attractive Area of Landscape’.
- 2.3.3 The current proposals, as set out below, provide for a scheme capable of delivering around 127,645 sqm GIA (1,373,959 sq.ft) of floorspace across a wide range of floorplates to ensure that the site is capable of accommodating the fullest possible range of occupiers.
- 2.3.4 As shown on the Illustrative Masterplan submitted alongside these representations (ref.

225039-IMA-ST-ZZ-DR-A-031002), the emerging proposals are for eight buildings (three of which can be subdivided), offering units between 3,104 sqm (33,410 sq.ft) and 26,030 sqm (280,182 sq.ft), and an internal height of between 12m to 15m to haunch. However, these are only illustrative plans at this stage and by their very nature Richborough has the flexibility to accommodate a different mix of units subject to market requirements and feedback from the Local Planning Authority.

- 2.3.5 Two points of vehicular access to the Site are proposed via Stoke Road on the Site’s eastern border. And it is proposed to formally link the two PRoWs mentioned above (SHA/2/1 and SHA/8/4) as part of the PRoW network, ensuring good active travel links between both Milton Keynes and Stoke Hammond.
- 2.3.6 The proposals will provide a minimum 45m landscape buffer to the south of the site, mindful of the gap with Stoke Hammond village to the south, and include attenuation ponds as part of a sustainable drainage strategy that will integrate with the existing topography as part of the landscape-led design. The combination of ecology rich green space and wildlife friendly sustainable drainage will provide opportunities to support biodiversity.



Figure 2: Illustrative Masterplan

**2.4 Site Benefits and Future Allocation**

National Context

- 2.4.1 The Site is located south of, and adjacent to, the settlement boundary of Milton Keynes,

a major city within the Oxford Cambridge Growth Corridor, a key pillar in the Government's stated ambition to deliver economic growth.

- 2.4.2 The Government's continuing commitment to this spatial policy was reiterated in the *Oxford-Cambridge Growth Corridor Investment Prospectus*, published on 21 October 2025, in the foreword of which the Chancellor of the Exchequer noted the following:

*Economic growth is the number one mission of this government and remains at the heart of all we do. The Oxford to Cambridge Growth Corridor is a key pillar of this mission and offers huge potential for the UK. It is Europe's answer to Silicon Valley.*

*Deepening the links between Oxford and Cambridge, Milton Keynes, Bedford and beyond with significant investment into East West Rail, will ultimately connect a region of 3.5 million people – highly skilled, highly employable, and highly mobile. Investors and businesses alike can seize the opportunity to be part of the Golden Triangle, bringing together the Corridor and London as one of the world's top innovation clusters.*

- 2.4.3 At a national level, the area forms a vital part of the strategic drive towards greater economic growth – one to which the Site can make a meaningful contribution.
- 2.4.4 Beyond the Government's interest in delivering employment within the Oxford Cambridge Growth Corridor, it is also worth establishing that there is strong support within the National Planning Policy Framework (NPPF) for meeting employment needs. In order to meet the presumption in favour of sustainable development, there is a requirement under paragraph 11(b) of the NPPF for plan-making to provide as a minimum for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.
- 2.4.5 Paragraphs 85 to 87 of the NPPF concern the Government's strategic goal of building a strong, competitive economy. Paragraph 85 states that:

*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*

- 2.4.6 Under paragraphs 86, planning policies should:
- *set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth;*
  - *set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
  - *pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics; and*
  - *be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.*
- 2.4.7 Finally, paragraph 87 is clear that planning policies should both recognise and address

the specific locational requirements of different sectors. This includes making provision for:

*Storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation.*

#### Regional Context

- 2.4.8 Regionally, the Site benefits from a number of strategic advantages: it has proximity to nationally significant movement corridors (M1, M40, East West Rail), which grants it convenient access to major freight handling infrastructure that can be used as part of wider supply chains for a range of sectors. These locational benefits ensure a reduction in both financial costs and environmental impacts owing to shorter distances travelled (the latter being particularly important with regard to the Environmental, Social, and Governance objectives of employers).
- 2.4.9 The site is close to Bletchley Railway Station, which now has a connection to Oxford via the East West Rail, a major infrastructure scheme linking Oxford to Cambridge, and ensures the Site is well placed to take advantage of, and contribute to the aspirations of the Growth Corridor.

#### Local Context

- 2.4.10 The Site forms a natural urban extension to Milton Keynes, particularly in the context of the appeal for 240 homes to the Site's west (ref. 24/03601/AOP, discussed above). From a locational perspective, the site is ideally placed to respond to local employment need and to take advantage of local circumstances.
- 2.4.11 The Site's proximity to Milton Keynes ensures ready and convenient access to a large labour supply, as well as strong transport links at the local level of public transport (via the Red routes and PRoWs mentioned above), as well as those of a regional and national scale mentioned above. There is also, as part of the Site's development strategy, an opportunity to provide a bus service through the Site, further increasing local connectivity, and improving transport links between Milton Keynes and Stoke Hammond.
- 2.4.12 Another key aspect of the local picture is the significant level of increased housing required under the revised Standard Method published in December 2024. Under this metric, the housing requirement in Buckinghamshire has risen from 2,912 dwellings per annum (dpa) to 4,319 dpa (an increase of 1,407 dpa). When one includes the 1,724 dpa that Milton Keynes are required to provide, this equates to 6,043 additional dpa. This is an ambitious housing requirement, which must be provided for as a minimum under paragraph 11(b) of the National Planning Policy Framework (NPPF). Buckinghamshire must ensure that it is planning for an appropriate amount of employment floorspace to ensure that residents have a sufficient amount of high quality jobs.

#### Site-Specific Advantages

- 2.4.13 The Site constitutes agricultural land, and is adjacent to an existing settlement and is a logical development site for the delivery of a landscape-led scheme that would make a

meaningful contribution to the Council's employment land supply.

- 2.4.14 The Site benefits from existing infrastructure that it can connect into early in the plan period. Owing to excellent transport connections and the Site's natural extension to an existing city in a neighbouring authority (Milton Keynes), the Site can be delivered now without the need for wider infrastructure works that could delay the Site coming forward. Development of the Site would present the opportunity to connect to existing sustainable travel routes and future improvements (including East West Rail). This is a significant advantage compared to other growth options which are likely to take longer to deliver (for example new settlements or large Strategic Urban Expansions).

#### Addressing Unmet Need

- 2.4.15 The Site's ability to come forward without delay is particularly relevant in the context of significant unmet need within both Buckinghamshire and Milton Keynes. As set out within responses to Questions 3 and 4 below, the estimated level of unmet need for Industrial and Logistics uses (I&L) is as follows:

- c. 140 ha in Buckinghamshire; and
- At least 223 ha in Milton Keynes.

- 2.4.16 The Milton Keynes figure is one that has been confirmed by Milton Keynes City Council in the Regulation 19 draft of their emerging Local Plan. There is a considerable employment land shortfall (both within Buckinghamshire and within neighbouring areas), and one which the Regulation 18 consultation documents published by the Council fail to address.

- 2.4.17 Buckinghamshire have not put forward a strategy for meeting, as a minimum their own need, nor those which Milton Keynes are unable themselves to meet. This is a core requirement of plan-making under paragraph 11(b) of the NPPF.

- 2.4.18 Buckinghamshire need to identify additional land to deliver employment floorspace, both to meet their own needs and, where appropriate, those of Milton Keynes.

- 2.4.19 The Site is relatively unconstrained, well-located to existing infrastructure, and comprises a natural urban extension. It is therefore a high-quality development site to deliver employment. Being an extension of Milton Keynes, it is ideally placed to contribute to Milton Keynes unmet employment needs as well as that of Buckinghamshire.

#### 2.4.20 Site Benefits

- 2.4.21 Indicative masterplanning exercises show that the site is capable of delivering around 127,645sqm (1,373,959 sq.ft). This will include a from large floorplate 'big box' units in excess of 9,300 sqm (100,000 sq.ft) as well as mid-box and small box buildings meeting the requirements of a range of potential occupiers. The site is capable of meeting needs within both Buckinghamshire and Milton Keynes.

- 2.4.22 The Site represents an excellent opportunity to deliver high quality and much needed employment space that is capable of addressing significant (and unmet) employment need, and making a meaningful contribution to Buckinghamshire's economy and the wider sub-region.

2.4.23 The site is also being progressed by a single specialist land promoter (Richborough Commercial) with a track record of delivery, meaning that difficult land assembly issues need not be overcome.

## 3 Consultation Documents

3.1.1 The Regulation 18 consultation is comprised of two separate parts, alongside a range of evidence base documents. The main consultation documents are:

- Part A – Spatial Strategy
- Part B – Development Management Policies

3.1.2 In addition, the Buckinghamshire Employment Evidence Study (prepared by Lichfields, dated 29 July 2025), along with associated appendices and the Executive Summary is also relevant. Lichfields have also prepared a Modern Economy report for Buckinghamshire, dated July 2025.

3.1.3 For the avoidance of doubt, these representations focus on those parts of the consultation documents considered most relevant to the promotion of the Site for employment use. Separate representations have been submitted regarding Richborough’s other residential interests elsewhere within Buckinghamshire.

### 3.2 Part A – The Spatial Strategy

3.2.1 Part A sets out the broad strategic options for the Plan, and offers focused questions relating to the options and approaches it provides. Our responses to relevant questions in Part A relate to the Employment Spatial Strategy, found in Chapter 7 of the document, and covers questions 3, 4, and 5 of the consultation:

- Question 3: Do you agree with the approaches to employment?;
- Question 4: Are there any other approaches that should be considered?
- Question 5: Should the new Local Plan aim to balance new employment land more evenly throughout Buckinghamshire to help meet the needs of local businesses?

### 3.3 Part B – Development Management Policies

3.3.1 Part B sets out (in full) the proposed Development Management Policies that are expected to be included within the emerging Local Plan. Policies considered the most relevant to the Site and its development aspirations are:

- EC3 – Skills and Local Employment;
- NE5 – Biodiversity Net Gain and Nature Recovery
- NE17 – Development in the Countryside outside of the Green Belt;
- TR5 – Freight and Logistics

## 4 Part A – Question 3: Do you agree with the approaches to employment

### 4.1 Summary of Approach

4.1.1 Part A of the Consultation document sets out a proposed Functional Economic Market Area (FEMA) for Buckinghamshire, including a perceived employment need of 219.4 ha to 204 ha, comprised of the following:

- 33.5 ha for offices and R&D (Use Classes E(g)(i) and (ii)); and
- 185.8 ha for industrial and logistics (Use Classes E(g)(iii), B2, and B8).

4.1.2 With the inclusion of sites that are already allocated, or which otherwise benefit from planning permission, there is a net need of 45.9 ha over the plan period. The consultation document states that:

*“New employment land will be designated in other locations [than those already allocated/approved] to help meet local business needs and to help re-balance the current skewed distribution. Technical work is underway to inform these allocations. In addition, there is likely to be new settlements within the Local Plan, and these will need to include land for new employment to create mixed use and balanced local communities.”*

### 4.2 Identified Level of Need

4.2.1 The consultation is supported by an Employment Evidence Study (EES) prepared by Lichfields and dated July 2025. This document claims a total demand for 185.8 ha of land for industrial and logistics (I&L) over the proposed Plan period. Factored against the supply, the EES states that there is a remaining need for 45.9 ha of employment land (including E(g)(i) and (iii)).

4.2.2 The demand figures of the EES are addressed in the I&L Needs Assessment which has been prepared on behalf of Richborough by Savills Economics and submitted alongside these representations. That report undertakes a detailed review of employment demand within Buckinghamshire over the plan period, with consideration for suppressed demand, and finds a demand of between 230 ha and 241 ha in Buckinghamshire over the plan period 2024-2045.

4.2.3 The report also considers cross-border opportunities with Milton Keynes in the context of a recently published Regulation 19 Plan from Milton Keynes that confirms that the city is unable to meet its I&L land needs, and consequently anticipates an unmet need of 220 ha within Milton Keynes alone.

4.2.4 With regard to forecast supply, the EES has made assumptions regarding extant permissions, allocations, and potential additional capacity, and concludes:

**Table 1: ESS Sources of Employment Land Supply**

Source	Floorspace (sqm)
Extant permissions – E(g)(iii)	18,940
Extant permissions – B2	6,413
Extant permissions – B8	55,140

Mixed	56,935
Allocations and additional capacity	456,560
<b>Total Supply</b>	<b>593,988</b>

4.2.5 With regard to the amount that can be secured from allocations and additional capacity, the table below reproduces Table 7.2 of the EES, with Savills' commentary added regarding the legitimacy of these sites and their suitability for expansion.

4.2.6 As set out below, many of these sites already have planning permission, and therefore ought to be identified as 'extant permissions.' The ESS does not list these sites, and it is therefore not to appropriately interrogate this aspect of the evidence base to both confirm the likelihood of extant permissions coming forward, and ensure that the evidence is not at risk of double counting.

**Table 2: ESS Breakdown of Allocation and Additional Capacity Sites**

Site	Former LPA	Floorspace (sqm)	Size (ha)	Savills Comment	Savills Assessment
Regent Park Expansion	Wycombe	20,560	5.1	5.1 ha is allocated under Policy PR9 of Wycombe Local Plan for employment uses. There are no relevant planning applications on the Council's webpage at the time of writing.	Retain
Former De La Rue, Hughenden Avenue	Wycombe	2,000	0.5	The site is not allocated within the Wycombe Local Plan. Site appears in the Call for Sites. There is no record of recent planning applications on the Council's website.	Retain
Land rear of Stokenchurch Business Centre	Wycombe	10,400	2.6	2.9 ha is allocated under Policy RUR10 of the Wycombe Local Plan for a mix of employment uses. There are no relevant planning applications on the Council's webpage at the time of writing.	Retain
Broadwater Park	South Bucks	10,000	2.5	The site is not allocated in the South Bucks Core Strategy, but there are two extant planning permissions across the site: <ul style="list-style-type: none"> <li>PL/24/2448/FA (granted 15 May 2025)</li> <li>PL/24/1982/FA (granted 13 Feb 2025)</li> </ul> In combination, these cover approximately 1.86 ha and provide 3,742 sqm of employment use with associated uses (café, teaching hub, amenity buildings). It ought not to be included within the list of expansion sites.	Remove
Marsworth Airfield, South site Long Marston Road Marsworth, Tring	Wycombe	18,000	4.5	The site is not allocated within the Local Plan. A planning application was submitted for 320 dwellings on the site in May 2023 (ref. 23/01594/AOP) and is currently pending. This involves the loss of 7,895sqm of B8 floorspace on site. In light of the pending application, it ought to be considered as a net loss of employment land.	Mark as loss

Site	Former LPA	Floorspace (sqm)	Size (ha)	Savills Comment	Savills Assessment
Pitstone Green Industrial Estate, Westfield Road, Pitstone	Aylesbury Vale	25,200	6.3	The site is identified as a Key Employment Site within the Local Plan, but is not allocated for development. It ought not to be included within the list of allocated sites. The site is fully developed saved for a discrete portion. Appendix 6 of the EES states that there is a pending planning application for 21,000 sqm of floorspace (ref. 22/03723/APP). The application was withdrawn 15 August 2023. The Site's planning history suggests that the extant application for 18,716 sqm of floorspace is being progressed (ref. 03/02081/ADP, granted 12 Nov 2003). It is considered to be part of extant permissions in Bucks.	Remove
AGT 5	Aylesbury Vale	36,000	9.0	The site is allocated in the Local Plan for 9ha of employment land. Permission has been granted for this under application 03/02386/AOP (approved 14 Nov 2007). It is considered to be part of extant permissions in Bucks.	Remove
Dropshort Farm, College Road, Aston Clinton	Aylesbury Vale	10,800	2.7	This is believed to comprise undeveloped land either side of the Household Recycling Centre. It is part of the Arla Key Employment Site within the Local Plan, but is not allocated for development. It was not promoted within the Call for Sites. There is no record of recent planning applications on the Council's website.	Retain
Westcott Venture Park EZ	Aylesbury Vale	54,000	13.5	The site is identified as a Key Employment Site within the Local Plan, but is not allocated for development. It has existing employment uses on site.	Remove
Land north of Lower Icknield Way, Princes Risborough	Wycombe	49,600	12.4	The site is reserved under Policy PR10 of the Wycombe Local Plan specifically to accommodate the relocation of existing businesses affected by the expansion of Princes Risborough. The need for this site will be kept under review by the Council. As Appendix 7 of the EES notes 'it is not clear that this site will come forward for employment development.'	Remove
Gomm Valley and Ashwells	Wycombe	5,600	1.4	1.2 ha is allocated under Policy HW6 of the Wycombe Local Plan for B1 uses. However, we acknowledge that this could be revised to include B2 and B8) in a forthcoming Plan.	Retain 1.2 ha

Site	Former LPA	Floorspace (sqm)	Size (ha)	Savills Comment	Savills Assessment
D-NLV001 - Land South of the A421 and east of Whaddon Road	Aylesbury Vale	8,000	2.0	The site has outline planning consent (ref. 15/00314/AOP, granted 20 December 2022) for a mixed use scheme including 2.07 ha for B1 employment space. Condition 37 of the decision states that these can only be used as office or R&D (i.e. E(g)(i), (ii)). It is therefore not considered available for I&L uses. It is considered to be part of extant permissions in Bucks.	Remove
Buckingham Neighbourhood Plan Allocation (BUC020)	Aylesbury Vale	6,800	1.7	Policy EE2 allocated 10 ha of land for employment development. As Appendix 7 of the EES notes, the site secured permission for 300 dwellings on the site under appeal (ref. 23/00178/AOP). This included 6,300 sqm of E(g)(iii). The EES suggests that there is additional land available within the allocation for future employment, but drawings submitted with the allowed application suggest this is not the case. It is considered to be part of extant permissions in Bucks.	Remove
Westcott Venture Park, Westcott (outside the EZ)	Aylesbury Vale	199,600	49.90	The site is identified as a Key Employment Site within the Local Plan. Portions are previously developed, and these comprise those parts that were promoted in the Call for Sites. However, the majority of the site was not promoted. Approximately 32 ha of the wider undeveloped portion of the site has permission for a 15MW solar farm under ref. 14/01909/APP (approved 11 May 2017). This in addition to two additional solar farms granted in August 2020 (ref. 10/01701/APP) and February 2011 (ref. 11/00245/APP). The Lichfields report notes this and appears to exclude this land from the 49,90 ha. However, in terms of developable area, this figure ought to be considered highly aspirational.	Retain

4.2.7 Revising the table in accordance with these comments gives the following quantum of land, applying a plot ratio of 35%, as opposed to the 40% figure used in the EES. The rationale for this ratio is set out in detail within the Savills I&L Needs Assessment submitted alongside these representations.

**Table 3: Revised Supply Figure (Savills Assessment)**

Site	Former LPA	Site Size (ha)	Floorspace (sqm)
Regent Park Expansion	Wycombe	5.1	17,850
Former De La Rue, Hughenden Avenue	Wycombe	0.5	1,750
Land rear of Stokenchurch Business Centre	Wycombe	2.6	9,100
Marsworth Airfield (south site)	Wycombe	-4.5	-7,895

Pitstone Green Industrial Estate	Aylesbury Vale	6.3	18,716
Gomm Valley and Ashwells	Wycombe	1.2	4,200
Westcott Venture Park, Westcott (outside the EZ)	Aylesbury Vale	49.9	174,650
<b>Total</b>			<b>218,371</b>

4.2.8 Our revised figure is set out below, alongside those set out in the EES for comparison. As the table shows, the EES is considered to have significantly underestimated the quantum of land required within Buckinghamshire over the 21 year plan period.

**Table 4: ESS Requirement -v- Savills Assessment**

	ESS Figures(sq m)	Savills Figures (sq m)
<i>Supply - extant permissions</i>	13,7428	137,428
<i>Supply - allocations and additional capacity</i>	456,560	218,371
Total Supply	593,988	355,799
Demand	684,370	845,165
Unmet Need	-90,382	-489,366
Appropriate Plot Ratio	40%	35%
<b>Land Requirement</b>	<b>23 ha</b>	<b>c.140 ha</b>

4.2.9 The quantity of employment land required within the Regulation 18 Part A Consultation document (across both office and I&L uses) is stated to be 45.9 ha. However, both our I&L Needs Assessment and the preceding table show, the need for I&L alone is significantly higher, and estimated at c.140 ha.

### 4.3 General Comments on the Proposed Approaches

4.3.1 In our view, the Council's proposed approaches are incapable of meeting the level of anticipated I&L needs, partly owing to the fact that they were prepared in the context of an improperly low requirement figure. A strategically different method of approach will be required to deliver the c.140 ha of I&L land required over the plan period as set out above.

### 4.4 Approach 1 - Expansion at strategic employment sites (Silverstone, Westcott and Pinewood and continued delivery of employment growth at Woodlands)

4.4.1 The expansion of existing strategic employment sites, such as those listed, will see growth in specific sectors, but are likely to fail in the delivery of land for more general I&L users and occupiers across other sectors.

4.4.2 In particular, we note those listed in the approach have the following specialties:

- Silverstone Enterprise Zone – Motorsport;
- Westcott Enterprise Zone – Advanced engineering and space hub;
- Pinewood – Film production; and

- Woodlands Enterprise Zone – Agri-food and human health.
- 4.4.3 These are clusters of highly specialised industries, and expansion of these areas may serve only to build upon the existing strengths of those sectors, rather than encouraging growth in more traditional I&L uses that are vital for sustained economic growth.
- 4.4.4 The Enterprise Zones are also not well suited for logistics and distribution uses, which require ready access to the Strategic Highway Network, the closest M-roads to these sites are:
- Silverstone Enterprise Zone – M40, approximately 13 miles away;
  - Westcott Enterprise Zone – M40, approximately 12 miles away;
  - Woodlands Enterprise Zone – M25, approximately 18 miles away.
- 4.4.5 The specificity of Pinewood is directly recognised within the EES. At paragraph 6.47, it notes:
- “Pinewood Studios has been considered in high-level terms only given the specific role and nature of the site as a long-established and leading centre for film production.”*
- 4.4.6 Beyond the specificity of these areas, it is not clear what scope there is for these sites to expand to accommodate I&L uses. A considerable portion of the Westcott site benefits from permission for a 15MW solar farm (refs. 14/01909/APP, approved in May 2017; 10/01701/APP, approved in August 2020; and 11/00245/APP, approved in February 2011).
- 4.4.7 Land south of Pinewood, which has an extant permission for additional film studios, is currently subject to a pending application for a data centre, which is not capable of addressing traditional I&L occupiers. However, the Approach talks about ‘continued delivery’ of employment growth at Woodlands, which may simply be a reference to the 102,800 sqm of employment space granted under 16/01040/AOP, and which is part of the committed supply.
- 4.4.8 Expansion of sector-specific enterprise zones is supported, but this cannot be a substitute for the delivery of strategic employment sites that are not tied to specialised occupiers.

#### **4.5 Approach 2 – New employment within urban expansions and new settlements (see housing approaches 2 and 3)**

- 4.5.1 The identification of new employment sites delivered as urban extensions is wholly supported. Doing so offers an opportunity to deliver strategic-scale development close to an established employment base, and make sure the employment is located close to housing.
- 4.5.2 This strategy ensures that much of the infrastructure required to deliver such sites is already present, and can thereby significantly reduce the amount of time it takes to bring such sites forward. By connecting into existing neighbourhoods, this constitutes a logical part of the Plan-led approach to delivering an area’s objectively assessed need.
- 4.5.3 The Council should expressly consider the expansion of existing settlements on the edge of its local authority boundary alongside settlements wholly within Buckinghamshire

itself. In particular, there is an opportunity for the plan to facilitate the southward expansion of the city of Milton Keynes into the very northern part of Buckinghamshire. Indeed, the Milton Keynes settlement boundary has already crossed into Buckinghamshire at Newton Leys and there are live applications for further expansion into this Plan area (as mentioned above). The ability to 'plug into' existing and committed planned infrastructure (including East West Rail) should not be underestimated. In our view, this is one of the most sustainable locations for growth in the whole of the country. Arguably, it also has the added benefit of being one of the least sensitive locations in terms of its impacts on Buckinghamshire's existing communities.

- 4.5.4 As part of this exercise, the Site ought to be identified as a highly sustainable site, and allocated as an employment site within the emerging Plan. It is ideally located to contribute towards unmet need within both Buckinghamshire and neighbouring authorities, and forms a natural urban extension to Milton Keynes. As set out below, the unmet need for employment floorspace in Milton Keynes is stated by the City Council to be at least 223 ha.
- 4.5.5 Buckinghamshire are required, under paragraph 11(b) of the NPPF, to provide for the objectively assessed needs within its own area as well as any needs that cannot be met within neighbouring areas.
- 4.5.6 The Site can help address not only Buckinghamshire's need, but also that of Milton Keynes. It is located on the authority boundary of Milton Keynes, as well adjacent to its settlement boundary. It is also important to consider the site in the context of the neighbouring residential site to the west (ref. 24/03601/AOP), and this wider area could be regarded as a sustainable urban extension capable of delivering both housing and employment development.
- 4.5.7 The Plan must clearly and unambiguously include, as one of its approaches, the identification and allocation of new strategic employment sites, and ensuring that these are located as part of urban expansions is ought to be a clear part of a sustainable strategy for delivering growth.

#### **4.6 Approach 3 - Small-scale employment sites promoted through the 'calls for sites'**

- 4.6.1 The provision of small-scale employment sites ought to be a key part of the approach for meeting employment need, especially at a local level, but this alone cannot deliver the scale of strategic employment land needed, and especially not at the scale required. Notwithstanding this, the Site can accommodate a range of unit sizes and configurations, including 'small box' employment units.

#### **4.7 Approach 4 - Modern Economy uses including datacentres - main opportunity area at Iver linked to Slough - Hayes Availability Zone**

- 4.7.1 Owing to its proximity to the Slough Availability Zone (SAZ), Buckinghamshire (and the area of South Bucks specifically) is a highly attractive area for hyperscale data centres.

Recent allowed and called-in appeals, including those at Woodlands Park<sup>1</sup> (ref. PL/24/0754/OA) and Court Lane<sup>2</sup> (PL/22/4145/OA) have established that the scale of need with the SAZ is considerable.

- 4.7.2 In the Woodlands Park appeal decision dated 09 July 2025, the Secretary of State noted that:

*“The Secretary of State agrees with the undisputed position that need within the Slough Availability Zone (SAZ) has continued to rise significantly, from a short to medium term need of 1700MW identified in the Court Lane decision to a mid-range estimate of some 2,486MW of additional capacity needed between 2024 and 2029, which will continue to rise to some 2,858MW.”* [para 17]

- 4.7.3 Based on a range of consented schemes with the SAZ (see table below), an average delivery of 0.0014 MW per sqm can be expected, therefore requiring the delivery of at least 1,775,714 sqm of floorspace up to 2029. Even assuming that these are all delivered within three-storey buildings, this would equate to a total build floorplate of circa 591,903 sqm (c.59 ha – without making adjustments for landscaping, access, parking, and other factors affecting plot development ratios).
- 4.7.4 Whilst it is understood that not all of this will come forward within Buckinghamshire, this is for the first five years of the Plan only, and over the proposed plan period of 21 years, this figure will only grow, and is expected to do so at a near exponential rate.

**Table 5: Example Data Centre schemes and MW/sqm**

Site	Planning Ref	Floor Area (sqm)	MW	MW/sqm
CyrusOne LON2 West Drayton	Hillingdon: 37977/APP/2017/3046	7,484	13.92	0.0019
ARK Union Park Hayes	Hillingdon: 75111/APP/2020/1955	65,000	99	0.0018
Court Lane	Buckinghamshire: PL/22/4145/OA	69,110	100	0.0015
Iver Heath Data Park	Buckinghamshire PL/24/2130/FA	30,130	90	0.0013
200 Bath Road	Slough: P/20367/001	49,000	40	0,0013
210 Bath Road	Slough: P/20367/001	49,700	50	0.0010
Bay 9-13 Banbury Avenue	Slough: P/20054/001	15,089	19.2	0.0013
Woodlands Park, Iver	Buckinghamshire: PL/24/0754/OA	72,000	90	0.0013
<b>Average</b>				<b>0.0014</b>

- 4.7.5 Supporting ‘Modern Economy’ uses is strongly supported. Recent planning appeals have made it clear that the established overwhelming level of need is a material consideration that attracts substantial positive weight.<sup>3</sup>

- 4.7.6 However, the current evidence base fails to take appropriate account of this. The EES

<sup>1</sup> Woodlands Park Landfill Site. Application for Data Centre comprising up to 72,000sqm in Metropolitan Green Belt. Application refused by Buckinghamshire 25 June 2024. Appeal recovered and allowed on 09 July 2025. Planning application reference: PL/24/0754/OA.

<sup>2</sup> Court Lane Industrial State. Application for Data Centre comprising up to 65,000sqm in the Metropolitan Green Belt. Application refused by Buckinghamshire 17 October 2023. Appeal recovered and allowed 06 December 2024. Planning application reference: PL/22/4145/OA

<sup>3</sup> Woodlands Park Appeal Decision, para 8.39.

does not appear to factor in data centre need within its calculations, nor does the 'Modern Economy Study' that forms part of the evidence base.

- 4.7.7 Data centres fall under Use Class B8, and meeting the near exponential growth in demand for data centre floorspace on identified employment sites threatens not only to reduce the existing stock of I&L floorspace, but also reduce the availability of future supply for traditional I&L occupiers.
- 4.7.8 There is a clear need to ensure that a sufficient supply of land to accommodate data centre need is identified within the Plan. Without this, there is a risk that more traditional I&L occupiers will be priced out of the market, and be unable to secure space.

#### **4.8 Approach 5 - Intensification and expansion at existing 'key employment sites' (37 sites identified in the Employment Land Review e.g. Globe Park, Cressex, Rabans Lane)**

- 4.8.1 Intensification is supported in principle, but there is a risk that its ability to meet employment needs is overstated.
- 4.8.2 As set out within the I&L Needs Assessment prepared by Savills, a plot development ratio of 35% is considered an ambitious reflection of modern I&L occupiers, who require larger building footprints and lower site coverage for adequate yard space, cross-docking, sustainable urban drainage, and strategic landscaping. Plot development ratios for I&L are typically no higher than 30% to 35%.
- 4.8.3 The intensification/expansion of existing employment sites to meet the estimated shortfall is therefore considered inadequate - even in combination with the other approaches identified.

#### **4.9 Approach 6 - Utilising town centres to support regeneration**

- 4.9.1 Town centres are not going to be able to deliver the size and scale of land to accommodate employment land requirements. This Approach can help contribute to office space, and certain small-scale I&L uses, but cannot provide a supply of strategic employment land.

## 5 Part A - Question 4: Are there any other approaches that should be considered?

### 5.1 Summary of additional approaches

5.1.1 In our view, the Plan ought to include a combination of two additional approaches as part of its Strategy:

- A – Identify new sites capable of delivering strategic employment growth to meet unmet need for Buckinghamshire over the Plan period; and
- B – Explore the potential to help neighbouring authorities meet their unmet need, through the provision of additional employment land.

### 5.2 Additional Approach A – Identify New Sites for Strategic Employment Growth

5.2.1 As set out above, there is a need to identify an estimated c.140 ha of employment land to meet currently anticipated levels of unmet need within the County. This requires the delivery of strategically significant sites, and the identification of new land. The proposed approaches, the majority of which seek effectively to expand and intensify existing sites, are not themselves, either in isolation or in combination, capable of delivering the scale of new employment development required over the plan period.

5.2.2 Approach 2, which seeks to deliver employment sites as part of urban extensions in line with housing growth is the closest that the consultation document comes to a commitment to identify new land for employment uses, and would align with Richborough’s promotion of the Site. However, in our view, a separate approach that makes clear that land devoted to employment will be identified and carried forward for allocation is needed in order to ensure that unmet needs are met in full.

5.2.3 As part of this exercise, the Site ought to be identified as a strategic employment site capable of meaningfully contributing to the supply of land. Indicative masterplanning suggests that the site is capable of delivering around 127,645 sqm (1,373,959 sq.ft).

### 5.3 Additional Approach B – Address Unmet Need from Neighbouring Authorities

5.3.1 Leaving aside Buckinghamshire’s obligation to meet its own needs, there is also, under the Duty to Co-operate with neighbouring authorities, a requirement to consider the unmet need of neighbouring authorities. Paragraph 11(b), which sets out what strategic policies should seek to achieve as part of the presumption in favour of sustainable development, states that:

*[S]trategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- ii. any adverse impacts of doing so would significantly and demonstrably*

*outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

5.3.2 This includes the requirements of Milton Keynes City Council (MKCC), which closely borders the Site to the north. Indeed, the Site serves as an urban extension of the city, and ought to be seen not only in the context of Buckinghamshire Council, but also as opportunity for the natural expansion for Milton Keynes.

5.3.3 MKCC undertook a Regulation 18 on their emerging Local Plan between July and October 2024. The Plan is proposed to cover the 22 year period from 2022 to 2050). A Regulation 19 consultation was approved for consultation at a Delegated Decisions meeting of the Council on 28 October 2025. The consultation itself will take place between November and December 2025. Milton Keynes published an Economic and Cultural Prosperity Topic Paper in July 2024, which underscored the key role that the city plays in the warehousing and logistics sector (owing in part to its excellent access to the Strategic Highway Network, and employment base). However, it also noted that opportunities for further expansion were reducing:

*“With around 18 million people living within a 90-minute drive time of Milton Keynes. Milton Keynes is a popular location for warehousing and logistics reflecting its excellent location, transport access to the M1 corridor and availability of large-scale sites to accommodate warehousing. However, in the future opportunities for the further growth of warehousing in Milton Keynes are diminishing due to the lack of suitable land to accommodate the specific needs of this sector.”<sup>4</sup>*

5.3.4 The Topic Paper’s key conclusion related to the city’s inability to meet its forecasted employment need:

*“A major issue identified in this Topic Paper is Milton Keynes is unable to accommodate forecasted needs for industrial and particularly warehousing floorspace over the plan period. Through the Regulation 18 consultation the Council will consult over how it should deal with this issue and if any developer /land owner wishes to promote land for warehousing.”<sup>5</sup>*

5.3.5 In order to help meet their needs, the Topic Paper points directly to the Duty to Co-operate:

*“Our options for meeting this shortfall and mitigating risks to the MK City Plan 2050 include through Duty to Co-operate meetings, requests to neighbouring local authorities to accommodate our needs, and consult on how we deal with warehousing in the future including inviting further promotion of land for warehousing through the Regulation 18 consultation.”<sup>6</sup>*

5.3.6 MKCC’s employment need over the Plan period is set out in the Housing and Economic Needs Assessment (HEDNA) 2023, prepared by Opinion Research Services and Hardistry Jones Associates and dated March 2024. This states that the Plan should seek to provide between 420 and 580 ha of land for I&L uses (Use Classes E(g)(iii), B2, and B8. Of this, between 420 and 470 ha is for B8 use alone.

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<sup>4</sup> Milton Keynes City Council, Economic and Cultural Prosperity Topic Paper (July 2024, para 2.6)

<sup>5</sup> Milton Keynes City Council, Economic and Cultural Prosperity Topic Paper, July 2024, para 8.2)

<sup>6</sup> Milton Keynes City Council, Economic and Cultural Prosperity Topic Paper, July 2024, para 6.14)

5.3.7 With a claimed supply of 230 ha of land in Milton Keynes, the HEDNA therefore states that additional supply of 190 to 250 ha of land will be needed to meet MKCC need over the 28-year plan period of 2022-2050.

5.3.8 The Regulation 19 version of the Plan gives an unmet need (under the ‘mid-forecast’ scenario, of around 223 ha (a stated requirement of 433 ha against a supply of 210 ha):

*“Under this [mid-forecast] scenario office development will require 66 hectares of land, industrial floorspace 57 hectares of land and warehousing will require 310 hectares of land. The total forecast requirement for land for office, industrial and warehousing sites is 433 hectares, which significantly exceeds the supply of employment land available at around 210 hectares. However, at 310 hectares (72%) most of this forecast requirement for land is for warehousing. If suitable sites for warehousing development are not available in Milton Keynes, developers will seek to develop sites where suitable sites are available.”<sup>7</sup>*

5.3.9 Two points worth noting here are:

- The HEDNA stated a supply of 230 ha of land for I&L. Supply has therefore reduced by 20 ha since that report was prepared in 2024; and
- The stated need in the Regulation 19 Plan of 433 ha overlooks the recommendations of the HEDNA, which states that MKCC should seek to provide between 420 and 580 ha of land for I&L uses.

5.3.10 The draft Plan states that “if suitable sites for warehousing development are not available in Milton Keynes, developers will seek to develop sites where suitable sites are available,” but this does not represent a sound, Plan-led approach to meeting identified needs. If MKCC are unable to meet their requirements, Buckinghamshire must consider whether they are in a position to help meet this need under paragraph 11(d) of the NPPF.

5.3.11 The draft Local Plan that was published as part of the Regulation 18 consultation set this out more clearly, identifying an allocated supply of 275.5 ha of land for all employment uses (office and R&D were not separated out from I&L), and identified a shortfall of up to 304.5 ha of land over the Plan period. This appropriately considered the HEDNA’s upper-range demand figure of 580 ha. The current shortfall in the Regulation 19 Plan of 223 ha ought therefore to be considered an absolute minimum.

5.3.12 The Regulation 18 draft set out core challenges and trends.<sup>8</sup> The first bullet point is preserved in the Regulation 19 draft, but the second two have been removed. In our view, the relevant of all three is unchanged:

- *Need to replace and repurpose ageing stock of commercial floorspace (office, industrial and warehousing floorspace) within the area. The amount of floorspace required to replace ageing commercial floorspace is greater than the amount of floorspace forecast to be required by economic growth.*
- *Forecast need for around 480,000 – 520,000 square metres of office floorspace should be considered in the MK City Plan 2050. Most of this office development, at around 300,000 square metres, will occur in CMK in line with both occupier and policy*

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<sup>7</sup> Milton Keynes City Council, MK City Plan 2050 Regulation 19 Draft (October 2025, para 38))

*requirements.*

- *Forecast need for around 420-580 hectares of land for warehousing and general industrial purposes, most of which is for warehousing. Taking account of land already due to come forward and new employment sites totalling 275.5 hectares, this means a remaining need of 144.5 to 304.5 hectares of land.*
- 5.3.13 Considering MKCC's stated inability to meet its anticipated employment needs in full, and in light of the considerable shortfall of up to 223 ha of land in the context of their own evidence base and assessments, the northern (former Aylesbury Vale) part of Buckinghamshire is well placed to contribute to a proportion of this unmet need as part of the Duty to Co-operate.
- 5.3.14 The southern settlement boundary of the city of Milton Keynes is practically identical to the northern authority boundary of Buckinghamshire. Indeed, residential development at Newton Leys crosses into Buckinghamshire. This is proposed to be extended further southwards through Richborough's submitted appeal for 290 homes (ref. APP/J0405/W/25/3370338), to the west of the Site. Should this appeal be allowed, it clearly sets the direction of travel for further growth to the south of the existing Milton Keynes boundary.
- 5.3.15 In order to meet its needs, the city of Milton Keynes needs to expand southwards, allowing full advantage to be taken of the East-West Rail line, access to the Strategic Highway Network, the locational advantages of the Oxford-Cambridge Corridor, and the resident employment base at Milton Keynes. This necessitates development within Buckinghamshire, which includes land on the southern and western edges of Milton Keynes. Richborough is in a prime position to deliver this expansion, controlling key parcels of land for residential and employment to the south of the city, within Buckinghamshire.
- 5.3.16 Buckinghamshire's Plan needs to allocate, where possible, land that is capable of contributing to both its own unmet need, as well as the unmet need of neighbouring authorities, including the significant unmet need in MKCC.
- 5.3.17 As part of this, the stated EES FEMA, which comprises simply Buckinghamshire, is not considered a sound approach. A more appropriate distribution is considered to be one that appropriately recognises Buckinghamshire as an authority that faces south towards London, north towards Milton Keynes, and east/west as part of the Oxford Cambridge Growth Corridor.
- 5.3.18 As a minimum, the FEMA should be amended to include MKCC, the urban settlement of which Buckinghamshire borders, and the unmet needs of which it ought properly to consider.
- 5.3.19 The Site represents a natural urban extension to Milton Keynes, and is ideally placed to help contribute to meeting KMCC's significant unmet need.

## 6 Part A – Question 5: Should the new Local Plan aim to balance new employment land more evenly throughout Buckinghamshire to help meet the needs of local businesses?

### 6.1 Context for Distribution of Development

6.1.1 Part A of the consultation document comments on the current location of employment land within the County. This is set out at the top of p.42 of the document:

*“The current distribution of new employment land is skewed towards the north and centre of Buckinghamshire. This is primarily due to the scope within current commitments at Silverstone, Woodlands and within the existing employment site at Wescott.*

*New employment land will be designated in other locations to help meet local business needs and to help re-balance the current skewed distribution. Technical work is underway to inform these allocations. In addition, there is likely to be new settlements within the Local Plan, and these will need to include land for new employment to create mixed use and balanced local communities.”*

6.1.2 The locations quoted above are all within the former borders of Aylesbury Vale, and are designated as the three Aylesbury Vale Enterprise Zones (AVEZs) in the adopted Local Plan. As set out in our response to Question 3, these are established, specialised zones that cater to specific employment sectors. They are also not ideally located for logistics and distribution owing to their distance from the M40 and M1 motorways and the wider Strategic Road Network. They are not, therefore, thought able to meet the wider needs of businesses either within Buckinghamshire or further afield.

6.1.3 The EES suggests that there is a shortfall of approximately 23 ha of employment land. However, as set out in our response to Question 3 above, a shortfall of c.140 ha is considered more realistic. In addition to this, there is a need under NPPF paragraph 11(b) to consider the unmet need of neighbouring areas including an identified shortfall of at least 223 ha in MKCC.

6.1.4 The notion that the delivery of employment land needs to be ‘rebalanced’ away from the north of the County, based on the existence of the three AVEZs to the north, is considered to be mistaken, principally for two reasons:

- Those EZs do not represent the general requirements of occupiers owing in part to their highly specialised nature. They are also located a considerable distance from M-roads and the Strategic Highway Network, proximity to which is a key requirement of logistics and distribution operators.
- There is considerable unmet need in MKCC to the immediate north of Buckinghamshire, and the evidence needs to recognise and consider the requirements of MKCC as part of its wider strategy.

6.1.5 There is a pressing need to increase the supply of employment land across the entire authority area, and distributing employment land throughout Buckinghamshire to help meet the needs of all businesses (not merely local ones) is strongly supported in principle.

However, this cannot mean that growth is moved away from areas that are in greatest need, such as the northern part of Buckinghamshire directly adjoining MKCC.

## 7 Part B - Policy EC3 – Skills and Local Employment

### 7.1 Summary of Policy

7.1.1 The policy states that new housing developments of over 100 dwellings or 1,000 square metres of office, industrial or storage/distribution floorspace should contribute to local employment and skills, secured through a Local Employment and Training S106 agreement.

### 7.2 Question EC3(a) - Do you agree that the threshold for new developments of 100 or more dwellings or 1,000sqm or more floorspace is appropriate?

7.2.1 Richborough is wholly supportive of the policy aspiration, and would seek to achieve this as a matter of course as part of the delivery of Richborough Park – MK South.

## 8 Part B – Policy NE5 – Biodiversity Net Gain and Nature Recovery

### 8.1 Summary of Policy

8.1.1 The policy states that development required to provide Biodiversity Net Gain ('BNG') under national regulations should achieve the following percentage:

- a) 10% if delivered on site;
- b) 15% if delivered off site within Buckinghamshire;
- c) 20% if delivered using national credits.

### 8.2 Question NE5 - Do you agree with this policy to seek incentivise the provision of BNG within Buckinghamshire rather than further afield?

8.2.1 The policy goal to deliver BNG and encourage on-site provision where achievable is supported in principle.

8.2.2 However, this is already provided for in the Spatial Risk Multiplier that forms part of the Statutory Metric. This prescribes additional costs for the delivery of BNG outside of a local authority area, and sets the following rates of exchange for off-site credits:

- 1 credit is worth 1 BNG unit if the compensation is within the boundary of either the Local Planning Authority (LPA) or the National Character Area (NCA);
- 1 credit is worth 0.75 BNG units if the compensation is outside the boundary of either LPA or NCA, but within a neighbouring LPA or NCA;
- 1 credit is worth 0.5 BNG units if the compensation is outside the boundary of either LPA or NCA, and outside a neighbouring LPA or NCA.

8.2.3 The Spatial Risk Multiplier already serves to encourage the provision of BNG within an LPA's boundaries, and there is no precedent for expanding on this through the requirement for additional BNG requirements under local planning policy.

8.2.4 Increased BNG requirements for off-site provision risks threatening the viability of employment sites, especially in the context of the 40% plot ratio that the EES suggests as a baseline.

8.2.5 Owing to the nature of their use and layout, delivering 10% BNG on I&L sites can be challenging, especially for schemes seeking to deliver ambitious plot ratios capable of maximising the potential of a site to contribute to meeting employment need.

8.2.6 We therefore request that the policy is revised in three key ways:

1. Removal of the increased BNG requirements for offsite delivery in Buckinghamshire;
2. Removal of any additional penalties for off-site provision for employment sites, in acknowledgement that delivery of 10% BNG is not always feasible on these sites;
3. Inclusion of a 'subject to viability' clause.

## 9 Part B – Policy NE17 – Development in the Countryside outside of the Green Belt

### 9.1 Summary of Policy

9.1.1 The policy states that, within that portion of the countryside outside of the Green Belt, developments will only be supported where it is for at least one of the following:

- a) Development that accords with a made Neighbourhood Plan;
- b) Development for agriculture and forestry, outdoor sports and recreation, and for cemeteries where there is an evidenced need;
- c) Additional buildings where these are required to support an existing rural enterprise or business located in the countryside, which are proportionate to the existing;
- d) The construction of additional buildings only within settlement built up areas. These also apply to any made neighbourhood plan settlement boundaries;
- e) Rural Exceptions Site housing
- f) Sites for travellers
- g) Housing for rural workers
- h) Extensions, outbuildings and alterations to existing dwellings
- i) The conversion of existing buildings
- j) The redevelopment of previously developed land, provided that this respects the rural character of the surroundings and has no greater impact than the existing building or structure

### 9.2 Question NE17(a) - For policy NE17 is it clear on the land uses the council should support that come forward in the countryside outside the Green Belt?

9.2.1 The policy applies effectively the same constraints on Green Belt land to countryside land . Paragraph 154 of the NPPF states that development in the Green Belt is inappropriate unless one of eight exceptions applies. These are listed below, along with which of the draft Policy NE17 criteria replicate that aspect of the NPPF.

**Table 6: Draft Policy NE17 in context of NPPF paragraph 154**

NPPF (paragraph 154)	Draft Policy NE17
Buildings for agriculture and forestry	Criterion (b)
The provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it	Criterion (b)
The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building	Criteria (c), (h)
The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces	Criterion (j)

NPPF (paragraph 154)	Draft Policy NE17
Limited infilling in villages	Criterion (d)
Limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)	Criteria (e), (f), (g)
Limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt	Criteria (i), (j)
Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are: <ul style="list-style-type: none"> <li>i. mineral extraction;</li> <li>ii. engineering operations;</li> <li>iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;</li> <li>iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;</li> <li>v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and</li> <li>vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.</li> </ul>	Criteria (a), (b), (i) [items iv., v., and vi. only]

9.2.2 Indeed, owing to the fact that draft Policy NE17 makes no allowance for mineral extraction, engineering operations, or local transport infrastructure which can demonstrate a requirement for a Green Belt location, the draft policy is arguably more stringent than NPPF paragraph 154.

9.2.3 Also, notably, development in the Green Belt is not inappropriate subject to consideration of grey belt, unmet need, the sustainable location of the site, and where relevant the requirements of the Golden Rules. In this, the policy serves to effectively applies greater protection to non-Green Belt land than Green Belt land. Where development in the Green Belt is considered to be inappropriate, the applicant must demonstrate Very Special Circumstances under NPPF paragraph 153.

9.2.4 Whilst the supported land uses for development in countryside outside the Green Belt are clear, the policy is far too restrictive, and does not represent a sound approach to plan-making. In order to make sure that the Plan puts forward a robust strategy for ensuring that future needs can be met, the Plan ought to make provision for supporting development adjoining existing settlements (including those adjoining other LPAs, subject to appropriate criteria.

**9.3 Question NE17(b) Please give any suggestions for other land uses that should be supported and added into the policy**

9.3.1 The policy is far too restrictive, and ought to be removed from the draft Plan.

9.3.2 It serves to establish a level of protection for countryside land that is equal to (as stated

above) in practice greater than that afforded to Green Belt land itself. Paragraph 144 of the NPPF is clear that 'new Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions,' and paragraph 145 states that 'Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans.' By seeking to effectively extend Green Belt protection to non-Green Belt land, the draft policy is attempting to achieve a revision of Green Belt boundaries. Exceptional circumstances are not considered to exist in order to achieve this, and the policy is therefore not considered to constitute a sound approach.

- 9.3.3 The policy should be removed from the plan. Instead, a new policy approach should make allowance for sites that are able to contribute towards unmet need, for example those adjoining existing settlements such as the city of Milton Keynes. It should also include allowance for site-specific considerations such as (but not restricted to) landscape, suitability, and sustainability of location.

## 10 Part B – Policy TR5 – Freight and Logistics

### 10.1 Summary of Policy

10.1.1 The policy states that:

- 1 Facilities that enable sustainable freight activity and first mile / last mile solutions, in accordance with the adopted Local Transport Plan, will be supported.
- 2 Smart warehousing through retrofitting of existing stock will be supported.
- 3 New proposals (temporary or permanent) for freight and logistics movements should not have a significant detrimental impact on the local area.
- 4 Developments with retail or food-retail must ensure suitable access arrangements, loading and unloading facilities are provided.
- 5 Employment sites must have suitable facilities and access arrangements for ongoing freight deliveries.

### 10.2 Question TR5 - To what extent do you agree or disagree with the policy approach to freight and logistics?

10.2.1 The policy as worded lacks clarity, and is considered not to provide appropriate support for this sector, for which there is considerable unmet need both within Buckinghamshire and within MKCC. As set out in our response to Part A, Question 3, there is an unmet need of around:

- c. 140 ha in Buckinghamshire; and
- At least 223 ha in MKCC.

10.2.2 Criterion 1, which supports facilities enabling sustainable freight activity, is supported.

10.2.3 Criterion 2 relates to the retrofitting of existing stock. This is supported, though it is noted that this alone will be insufficient to meet the scale of unmet need.

10.2.4 Criterion 3 lacks clarity and ought to be amended along the following lines:

*“Major development for B8 use should be accompanied by a transport statement confirming not unacceptable impact on the local highway network.”*

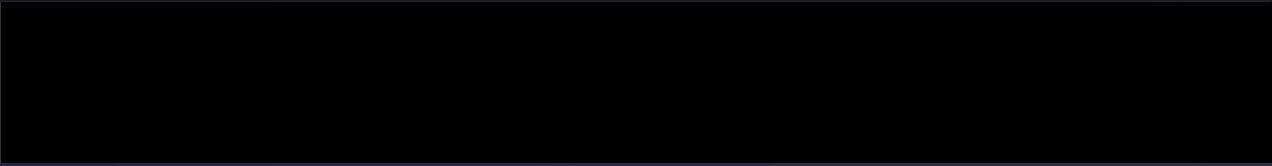
10.2.5 Criteria 4 and 5 relate to access and (un)loading arrangements within sites. It is not clear why, under criterion 4, the policy addresses retail uses as part of a policy devoted to Freight and Logistics. The need to provide suitable and adequate arrangements is supported, though the reality is that occupiers will be incentivised to provide these themselves outside of any policy requirement.

10.2.6 Beyond this, the policy approach is not considered to represent an appropriately ambitious or positive approach to delivering freight and logistics development. As set out in our response to preceding questions, the Plan ought to identify and allocate land for employment development, and champion and positive and pro-active approach towards meeting the considerable scale of unmet need within both its own administrative boundaries and those of neighbouring authorities.




















- 10.2.7 In order to ensure that the Plan is robust and able to accommodate future employment needs, including those currently not anticipated, the Plan ought also to contain clear support for speculative employment development proposals, subject to appropriate development management considerations.
- 10.2.8 This should include, at a minimum, the allocation of Richborough Park - MK South for employment use in order to contribute towards unmet need in the area.

Alex Cole

Henry Asson



**Key:**

-  Site Boundary - 113.82 Acres / 46.06 Hectares
-  Site Access Point
-  New Road Network through site
-  Proposed Commercial Development
-  Potential Sub-division of units
-  Landscape / Public Open Spaces
-  Proposed Landscaping
-  Proposed Hedgerow Planting
-  Indicative SUDS Drainage Features
-  New Shared Cycleway / Footway
-  Off-Site Highway Improvements
-  Existing Public Bridleway / Footpath
-  Existing PROW under off-site bridge
-  Trim Trail / Nature Walk
-  New Bus Route
-  Existing Bus Routes
-  Existing Bus Stops
-  LPA Boundary Line - Milton Keynes City Council
-  LPA Boundary Line - Buckinghamshire Council

**Design Notes:**

- The proposed employment development will deliver a significant number of new jobs within a sustainable location
- Provision of varying size of units will cater for differing occupiers, from smaller units to mid box
- A landscape led design will create varying characters and attractive spaces in addition to providing screening along the developments boundaries
- Several landscape characters will provide distinctive and attractive spaces alongside; Stoke Road, the Strategic Cycle Link, the Strategic Cycle Link, and the internal road network.
- To improve connectivity, enhancements are proposed to the existing highway and on-site public rights of way.
- A Strategic Cycle Link will connect the proposal to the existing 'Red Route' in the north and any future development proposals to the west.
- Provision of publicly accessible circular walking routes, wildlife walks and trim trails will provide for health lifestyles
- Cycle stores will be provided for all employment uses
- A potential internal bus connection is proposed to allow access to alternative means of sustainable transport
- A Sustainable Drainage Strategy is proposed that will integrate with the existing typography and form part of the landscape led design
- The combination of ecology rich green space and wildlife friendly sustainable drainage will provide opportunities to support biodiversity
- Identified on-site utility constraints are encompassed into the development framework



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Project Richborough Commercial  
 Proposed Employment Development  
 Richborough Park - Milton Keynes South

IMA Project No.	225039
	225039-IMA - ST-ZZ-DR-A-031002
Revision	P02
Status	Sketch
Drawing Title	Illustrative Masterplan
Date	29/10/2025
Scale	1:2000
Sheet Size	A1
Drawn By	BH
Checked By	BH



Pending appeal  
 for 290 homes  
 (24/03601/AOP)

Illustrative Masterplan  
 Scale 1:2000 at A1





Wider Context Illustrative Masterplan  
 Scale 1:5000 at A1

**Key:**

- Site Boundary - 113.82 Acres / 46.06 Hectares
- Site Access Point
- New Road Network through site
- Proposed Commercial Development
- Potential Sub-division of units
- Landscape / Public Open Spaces
- Proposed Landscaping
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Project	Richborough Commercial Proposed Employment Development Richborough Park - Milton Keynes South
IMA Project No.	225039
	225039-IMA - ST-ZZ-DR-A-031001
Revision	P02
Status	Sketch
Drawing Title	Wider Context Illustrative Masterplan
Date	29/10/2025
Scale	1:5000
Sheet Size	A1
Drawn By	BH
Checked By	BH



# Buckinghamshire Regulation 18 Local Plan Consultation

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## Industrial & Logistics (I&L) Needs Assessment

Prepared for Richborough Commercial

October 2025



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## 1 Introduction

### 1.1 Purpose

- 1.1.1 This report has been prepared by Savills Economics on behalf of Richborough Commercial (the Applicant), who are promoting land south of the A4146 (the Subject Site) for Industrial and Logistics (I&L) development. The report is submitted to the Buckinghamshire Regulation 18 Local Plan consultation.
- 1.1.2 The report provides an assessment of the 'needs case' for additional I&L development within Buckinghamshire which the Subject Site can help to meet, examining both current and future requirements based on a range of market signals. Its purpose is to inform the preparation of the emerging Local Plan 2045, with particular emphasis on the scale of I&L employment land required to support sustainable economic growth over the full plan period (2024-2045).
- 1.1.3 Our analysis demonstrates that there is significant demand for future I&L development within Buckinghamshire, which has been underestimated in the Council's employment evidence. The Subject Site represents, through the delivery of the Applicant's Proposed Development, a prime opportunity to help meet this demand. Accordingly, we consider that the Subject Site should be identified as an employment allocation within the emerging Buckinghamshire Local Plan.

### 1.2 Report Structure

- 1.2.1 The remainder of the report is structured as follows:
- Section 2 – Review of Employment Evidence - provides a high level review of the Council's existing employment evidence, and its approach to forecasting future I&L land requirements.
  - Section 3 – Importance of the I&L Sector to the local economy - outlines the importance of the I&L sector to the local economy and why its growth should be accommodated.
  - Section 4 – I&L Market Assessment - assesses supply and demand market signals within Buckinghamshire, as well as two major motorway corridors (the M1 and M40) in its vicinity. The aim of this analysis is to gauge the relevant market strength for I&L uses within these geographies.
  - Section 5 – Savills Future I&L Demand Estimate - presents Savills' future I&L demand estimates for Buckinghamshire. Our demand estimates are then compared to those in the Council's evidence base.
  - Section 6 – **Site's suitability for I&L development** - considers the Subject Site's strategic advantages which makes it a prime location for I&L development, and outlines how the Applicant's Proposed Development will leverage these opportunities.
  - Section 7 - Assessment of cross-boundary opportunity with Milton Keynes - examines the opportunity for the Subject Site to meet unmet demand from the adjacent local authority of Milton Keynes.

- Section 8 – Summary and Recommendations - consolidates the preceding analysis to justify the identification of the Subject Site as an employment allocation within the emerging Buckinghamshire Local Plan.
- Appendix A – Details Savills full methodology for estimating future I&L demand.

### 1.3 Reader Note

1.3.1 When we refer to the industrial and logistics (I&L) sector we mean Light Industrial (formerly B1c use class now part of Class E), General Industry (B2 use class), and Storage and Distribution (B8 use class). Effectively the primary use classes that require warehouses and factories (including ancillary offices), and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.

## 2 Review of the Local Plan Employment Evidence

### 2.1 Buckinghamshire Employment and Retail Evidence - Part A Employment Evidence Study (2025)

2.1.1 The most recent employment land evidence covering Buckinghamshire is the Buckinghamshire Employment and Retail Evidence - Part A Employment Evidence Study (EES), published by Lichfields in July 2025.

2.1.2 The purpose of the study is to provide an evidence base on the future needs for employment land and floorspace across Buckinghamshire to inform the preparation of the new Local Plan.

#### Future Demand

2.1.3 In terms of estimating future demand, the EES has regard to five different employment need scenarios, based on three different estimation methods. These are used to assess future employment land needs over a 21-year period (2024-2045), and are as follows:

- Scenario 1A and 1B - Employment (labour demand) forecasts;
- Scenario 2A and 2B - Past development rates; and
- Scenario 3 - Labour Supply.

2.1.4 We consider each of these methodologies and their corresponding land demand estimates now.

#### Scenario 1A and 1B - Employment Labour Demand Forecasts

2.1.5 The two employment (labour demand) scenarios rely on econometric models provided by Cambridge Econometrics (CE) and Experian to estimate future job growth within Buckinghamshire across 2024-2045. Scenario 1 is based on CE's job forecasts from April 2024, and Scenario 2 is based on Experian's job forecasts from December 2024.

2.1.6 The job forecasts under both scenarios are translated into floorspace estimates using employment densities informed by the 2015 HCA Employment Density Guide. This report - and the employment densities it provides - remains the most up-to-date government guidance. It reflects evolving trends in the use of employment space, including changing utilisation of office floorspace driven by increased flexible working and hot-desking practices. The following employment density ratios have been applied for I&L related floorspace:

- Light industrial (E(g)(iii)): 1 workforce job per 54.05 (GEA) sqm;
- General industrial (B2): 1 workforce job per 37.8 (GEA) sqm; and
- Warehousing (B8): 1 workforce job per 65 GEA sqm for smaller scale warehousing units, 1 workforce job per 71 sqm for medium scale, and 1 workforce job per 87.5 sqm for large units.

2.1.7 An allowance of 8% of the additional floorspace needed is added to all positive floorspace

requirements to reflect “normal levels of market vacancy in employment space” (paragraph 5.26 of the EES). Where a reduction in jobs is forecast, the associated negative floorspace is halved. This reflects that while there may be job losses (e.g. job losses as firms make greater use of automation), it does not automatically follow that all of the existing employment floorspace will be lost.

- 2.1.8 To allow for flexibility, the EES includes an additional safety margin as an allowance for factors such as delays in some sites coming forward for development. This margin, or flexibility factor, is contingency cover providing a modest additional land buffer so that supply is not too tightly matched to estimated demand. An allowance related to two-years net take-up in industrial and distribution employment uses has been applied. This corresponds to 1,840 sqm for light industrial E(g)(iii) uses, 13,890 sqm for Industrial (B2) uses, and 25,500 sqm for Distribution B8 uses. This safety margin is applied across all scenarios.
- 2.1.9 A plot ratio of 40% is then used to convert the floorspace requirements (sqm) across the industrial uses (Eg(iii)/B2/B8) to land requirements (ha).
- 2.1.10 Scenario 1A yields an expected gross floorspace requirement of 141,490 sqm for industrial uses. This translates into a land requirement of 35.4 ha of Eg(iii)/B2/B8 land in Buckinghamshire over the forecast period (2024-2045).
- 2.1.11 Scenario 1B yields a significantly higher gross floorspace requirement of 684,370 sqm for industrial uses. This translates into a land requirement of 171.1 ha of Eg(iii)/B2/B8 land in Buckinghamshire over the forecast period (2024-2045).

### Scenario 2A and 2B – Past development rates

- 2.1.12 Scenarios 2A and 2B are based on a past development rate method, which projects forward historic trends in development.
- 2.1.13 Scenario 2A considers past completions based on the Council’s monitoring data between 2012/13 and 2023/24, which has been provided to Lichfields. Based on the Council’s monitoring data, the net annual floorspace change for light industrial uses Eg(iii) is 920 sqm, 6,940 sqm for Industrial B2 uses, and 12,750 sqm for Distribution B8 uses. These net annual changes have been projected forward over the emerging plan period to inform future floorspace requirements.
- 2.1.14 Scenario 2B is based on recent floorspace trends in Buckinghamshire based on floorspace net absorption rates recorded by CoStar. Between 2014-2023, CoStar records positive annual net absorption of 36,924 sqm of industrial space (Eg(iii)/B2/B8) within Buckinghamshire. This net absorption figure is then projected forward over the emerging plan period. Net Absorption, as discussed further in paragraphs 2.2.28 – 2.2.31 and Appendix A, considers occupied space (move-ins) versus vacated space (move-outs), and is considered to be a market-facing measure of demand.
- 2.1.15 Scenario 2A yields an expected gross floorspace requirement of 474,030 sqm for industrial uses. This translates into a land requirement of 118.5 ha of Eg(iii)/B2/B8 land in Buckinghamshire over the forecast period (2024-2045).
- 2.1.16 Scenario 2B yields an expected gross floorspace requirement of 816,620 sqm for industrial uses. This translates into a land requirement of 204.2 ha of Eg(iii)/B2/B8

land in Buckinghamshire over the forecast period (2024-2045).

### Scenario 3 - Labour Supply

- 2.1.17 The final estimation method applied is a labour supply approach. This approach focuses on the future supply of labour rather than the demand for labour. This methodology estimates the amount of new jobs needed to match the future working-age population, and how much employment space would be needed to accommodate these jobs.
- 2.1.18 The EES notes that Opinion Research Services (ORS) has assessed the housing needs for Buckinghamshire over the emerging plan period, estimating a need for 4,290 homes per annum. As part of this, population and household projections have been produced and provide the basis for projecting the future growth in labour supply over the Local Plan period. It should be noted that the Regulation 18 Local Plan<sup>1</sup>, based on the standard method for calculation housing need, identified a slightly higher need of 4,332 dwellings per annum, 42 higher than the ORS.
- 2.1.19 Based on the projection from the ORS, the EES advises that 59,720 new jobs will be required over the 2024-2045 forecast period in Buckinghamshire. The proportion of jobs within office, industrial, and distribution sectors has been calculated based on the same shares assumed as in the Labour Demand Scenario (Scenario 1B). The job projections are then translated into employment floorspace requirements by applying the same employment densities used in Scenario 1 and adding an 8% vacancy allowance to positive floorspace.
- 2.1.20 Scenario 3 yields an expected gross floorspace requirement of 743,380 sqm for industrial uses. This translates into a land requirement of 185.8 ha of Eg(iii)/B2/B8 land in Buckinghamshire over the forecast period (2024-2045).

### Demand Comparison

- 2.1.21 A comparison of the different land requirements generated under the five scenarios for Eg(iii)/B2/B8 land in Buckinghamshire is presented in Table 2.1.

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<sup>1</sup> Buckinghamshire Draft Plan Consultation – Part A - Spatial Strategy (Regulation 18 Plan) (September 2025)

Table 2.1 Buckinghamshire employment land demand (Eg(iii)/B2/B8) 2024-2045, EES scenario comparison

	Industrial and Distribution (Eg(iii)/B2/B8) (Sqm)	Industrial and Distribution (Eg(iii)/B2/B8) (Ha)
Scenario 1A – Labour Demand CE	141,490	35.4
Scenario 1B – Labour Demand Experian	684,370	171.1
Scenario 2A – Past Trends Council Monitoring Data	474,030	118.5
Scenario 2B – Past Trends CoStar Net Absorption	816,620	204.2
Scenario 3 – Future Labour Supply	743,380	185.8

Source: EES (2025) – Table 5.14 and 5.15

- 2.1.22 Based on the five scenarios considered, the range of potential requirements for I&L uses is wide, ranging from 141,490 sqm (Scenario 1A) to 816,620 sqm (Scenario 2B). However, within this, scenarios 1B, 2B and 3 point to a generally higher level of need. By comparison, scenarios 1A and 2A indicate a significantly lower figure, which the EES notes is *‘not consistent with market signals or any of the other scenarios and are therefore discounted for this purpose’* (paragraph 5.52). To this effect, the EES discounts the results under Scenario 1A and 2A. We agree with this conclusion.
- 2.1.23 The highest figure arising from the EES analysis is Scenario 2B, which uplifts the total I&L requirement to 816,620 sqm. However, the EES notes that this requirement, based on the forward projection of net absorption trends, is impacted by a significant increase in industrial net absorption that occurred during the three pandemic years (2020-2022). When only taking into account net absorption rates outside of the pandemic years, this results in lower annual net absorption, which would be equivalent to a floorspace requirement of 357,000 sqm, which is more closely related to the requirements set out in scenario 2A (past trends – monitoring data).
- 2.1.24 The EES goes on to note that given *‘it is less clear that industrial net absorption will remain at these elevated levels over for the entirety of the future Local Plan period, a requirement of at least 680,000 sqm (under Scenario 1B) would appear to be a reasonable basis for future planning for industrial needs’* (para 5.54).
- 2.1.25 On this basis, the EES identifies a need for 684,370 sqm (171.1 ha) of industrial floorspace under Scenario 1B, which is considered a reasonable starting point and represents the minimum employment land requirement that the Local Plan should seek to provide for up to 2045 (paragraph 5.55).
- 2.1.26 While the EES advises that the demand estimate under Scenario 1B should form the minimum employment land required over the plan period, the Regulation 18 Plan states on page 40 that the employment need for industrial and warehousing & distribution uses

over the plan period is 185.8 ha. This figure appears to correspond to the demand figure under Scenario 3 from the EES. However, no further explanation is provided to justify the decision to adopt this figure.

- 2.1.27 The EES notes that this study (and the demand estimates generated) considers only the locally-generated employment needs associated with Buckinghamshire to 2045. It does not take account of wider 'footloose' or other inward investment needs outside of the local authority.

## 2.2 Savills' Observations

- 2.2.1 The above summary demonstrates that the EES has adopted a labour demand methodology (Scenario 1B) to estimate the *minimum* future I&L employment land needs for Buckinghamshire over the period 2024-2045. This equates to demand for 171.1 ha of I&L land. Concurrently, the Regulation 18 Local Plan has adopted a demand figure which appears to correspond to Scenario 3 of the EES (labour supply), stating an employment need of 185.8 ha over the plan period.

- 2.2.2 The key point to note is that, while both approaches align with Planning Practice Guidance (PPG), it is our view that neither methodology adequately account for market signals, as required by Paragraph 32 of the NPPF:

*'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'.*

- 2.2.3 As a result, in Savills' opinion, the use of labour demand or labour supply models routinely underestimate the 'true' market demand for I&L land.

- 2.2.4 While the EES does provide an assessment of a range of market signals in Chapter 5 of the report, including trends in industrial land take-up, availability rates, rental performance, and stock quality, this analysis does not feed directly into the demand modelling undertaken. As will be discussed, the most market facing methodology considered (Scenario 2B based on net absorption trends) has been discounted.

- 2.2.5 Within this sub-section, we outline what we consider to be some of the key weaknesses of the demand methodologies used in the EES, and why it has likely led to an underestimation of I&L land demand.

### 1. I&L Demand is only considered at the Buckinghamshire level

- 2.2.6 The EES considers I&L employment land needs solely within Buckinghamshire, treating the local authority as a Functional Economic Market Area (FEMA) in its own right. A FEMA represents a collection of areas which share economic linkages as defined by factors such as travel to work patterns, housing market areas, shared infrastructure, labour skills etc. The Planning Practice Guidance (PPG, paragraph O19) identifies these and other factors that should be considered when defining a FEMA, noting that there is no standard approach to defining a FEMA since patterns of economic activity vary from place to place. In the context of the I&L sector, a FEMA effectively represents the broad area of search that prospective occupiers would consider when looking to lease space, encompassing the competitor locations that influence occupier demand.

- 2.2.7 In Savills view, Buckinghamshire in isolation is not a FEMA. Rather, it forms part of a wider sub-regional market. In particular its relationship with the adjacent local authority of Milton Keynes (see Section 7) is a key consideration for I&L occupiers. As such, a broader, sub-regional approach to assessing future I&L demand is considered more appropriate.
- 2.2.8 I&L uses in particular require demand and supply signals to be looked at a wider area than a single local authority's administrative area. This is because, I&L occupiers typically have distribution networks linking their customers and suppliers of between 1 to 4 hours' travel time, sometimes longer, depending on their size i.e. up to 4 hours plus is more typical of very large companies with a national reach, while 1 to 2 hours' drive time is ideal for the majority of companies.
- 2.2.9 This is a point we have clarified with Savills Industrial Agency colleagues. Further evidence to support this assertion include:
- The ONS defines the UK's Logistics 'Golden Triangle' as being an area in the Midlands in which 90% of the British population can be reached within 4 hours driving distance<sup>2</sup>. The area has become the predominant logistics hub in the UK, renowned for its high density of distribution facilities.
  - The upper end of the 1 to 4 hour range broadly aligns with the UK's HGV driving regulations which mandate a 45-minute driving break after every 4.5 hours of driving<sup>3</sup>. A 4 hour truck drive time (including a minimum 45-minute break) therefore enables round-trip deliveries within a standard working day.
  - The 1 to 4 hour drive time (based on the ONS' definition of the Golden Triangle) is referenced by the UK Warehousing Association as being the key service time for warehouse occupiers<sup>4</sup>.
  - DWS, in collaboration with analytics specialists CACI, conducted in-depth research to identify the most attractive UK locations for urban logistics occupiers<sup>5</sup>. Their analysis involved mapping online consumer spending within one-hour drive-time catchments across the UK. This supports the view that even smaller urban occupiers operate distribution networks of around one-hour.
- 2.2.10 As such, I&L occupiers have limited regard to local authority boundaries. Instead, it is our experience they consider wider areas (such as a Property Market Area) that best allow them to serve their target customers and link with their suppliers. These areas take into account key factors such as access to distribution networks and freight corridors, as well as labour.
- 2.2.11 As a result, when planning for I&L land demand, it is critical that the wider demand and supply forces that will influence a local authority's I&L market dynamics are considered.

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<sup>2</sup> ONS - The rise of the UK warehouse and the "golden logistics triangle". Available here:

<https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/articles/theriseoftheukwarehouseandthegoldenlogisticstriangle/2022-04-11>

<sup>3</sup> RAC - <https://www.rac.co.uk/business/news-advice/fleet-management/hgv-driving-hours-explained>

<sup>4</sup> UK Warehousing Association - Guide to Warehousing in the UK (2022). Available here: <https://www.ukwa.org.uk/wp-content/uploads/2022/03/Enterprise-Ireland-Guide-to-Warehousing.pdf>

<sup>5</sup> DWS and CACI - Last Hour Logistics (2019). Available here:

[https://www.dws.com/globalassets/institutional/research/pdfs/Last\\_Hour\\_Logistics.pdf](https://www.dws.com/globalassets/institutional/research/pdfs/Last_Hour_Logistics.pdf)

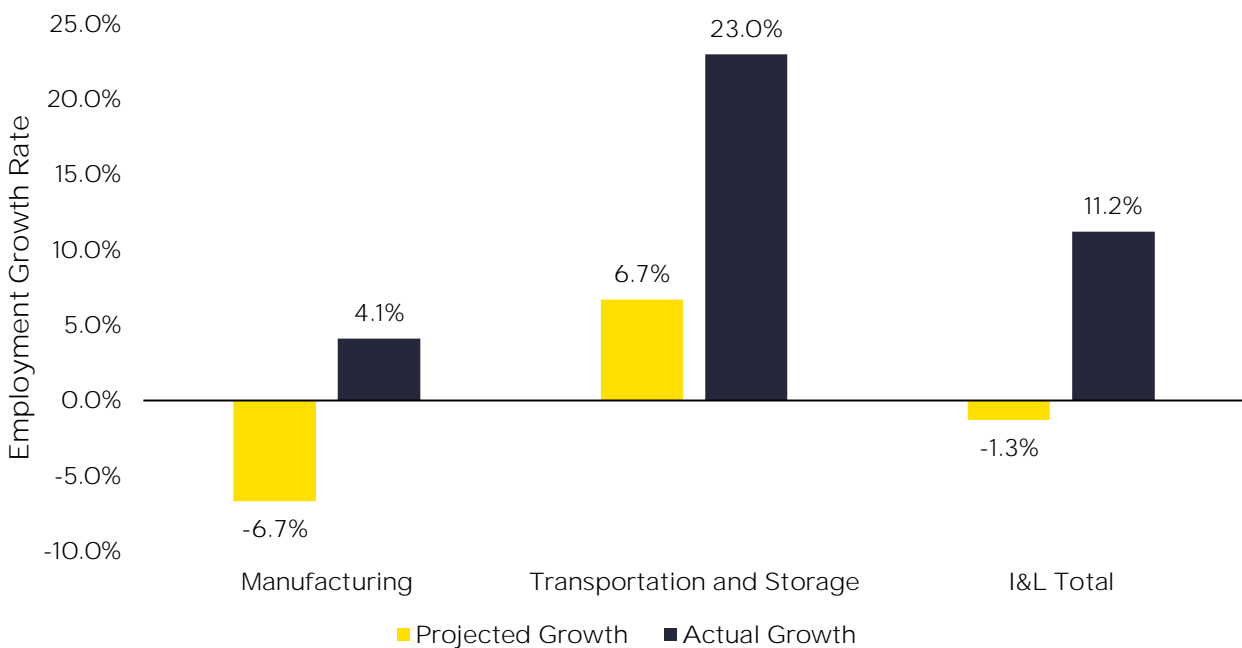
This has not been undertaken in the EES.

### 2. Labour Demand Methods Typically Underestimate Future Demand for I&L

2.2.12 Typically, the use of statistical models underestimate the I&L sector’s performance, and therefore the future need for I&L demand. This is mainly because they reflect the continuing restructuring of the economy away from industry (particularly manufacturing) towards services, and do not take into account market signals or current drivers of I&L demand.

2.2.13 For example, if you compare historic employment projections from the ‘Working Futures 2010-2020, Evidence Report’ by the UK Commission for Employment and Skills, against actual growth in employment in industries associated with I&L, it can be seen that the historic projections significantly underestimated what actually happened (Figure 2.1).

Figure 2.1 Estimated Employment Growth has Lagged Actual Employment Growth



Source: UKCES 2012, ONS Workforce by Industry (SIC, 2007) 2022, Savills

2.2.14 The reliability and accuracy of labour demand models are further called into question given the significant variance observed between the two scenarios. Under Scenario 1A, the EES projects a land demand of only 35.4 hectares, whereas Scenario 1B estimates a substantially higher requirement of 171.1 hectares - nearly five times greater. This pronounced disparity illustrates how highly sensitive labour demand models are to the assumptions and input parameters on which they rely. Even relatively minor variations in underlying assumptions, such as labour market conditions or the broader macroeconomic outlook, can generate markedly different outcomes. Consequently, this variability underscores the need to critically examine the assumptions underpinning model forecasts as they exert a decisive influence on the results.

2.2.15 Yet despite this, labour market projections provided by third-party statistical providers

such as CE and Experian often lack transparency, limiting the ability to scrutinize the underlying assumptions. For instance, it is unclear whether the employment forecasts incorporate key structural drivers of demand in the I&L sector, such as the growth of e-commerce and population and housing growth. We examine these future growth drivers from paragraph 2.2.23 below. Savills own demand estimates, while considering past trends in leasing demand, also seeks to incorporate current and future growth drivers such as an e-commerce uplift as we explain in Appendix A.

2.2.16 Given the drawbacks discussed above, it is our experience that labour demand models, particularly when it comes to forecasting future industrial land needs, are increasingly less relied upon by local authorities and consultants. Consultants, including Lichfields and IcenI, have recognised the limitations of such an approach. For example:

- South Tyneside Employment Land Review – Appendix 7 (2023), prepared by Lichfields, notes at paragraph 1.10: *There are limitations to the use of economic forecasts of this type, particularly during a period of economic uncertainty:*
  - *National macroeconomic assumptions are taken as a starting point and then modelled down to the regional and local levels, having regard to the existing economic profile and sector make-up of an area. As such, data at the local level is less reliable than at the national and regional levels; and*
  - *The top-down nature of the forecasts means that they are unable to take account of specific issues or interventions at the local level that could influence future employment growth.*
- Birmingham Housing and Economic Development Needs Assessment (2022), prepared by IcenI – notes at paragraph 17.17 *“In IcenI’s view, labour demand is generally a weak indicator of future industrial floorspace due to changes in technology that drive productivity but are often divorced from growth in the labour force, unlike typically office based sectors.”* IcenI then discount the employment land forecasts for industrial land based on the labour demand scenario considered (paragraph 17.28).
- Coventry & Warwickshire Housing & Economic Development Needs Assessment (2022), prepared by IcenI - notes at paragraph 9.26: *“The modelled reduction in industrial floorspace / land needs is however not considered reliable because of the weak relationship between employment trends and future floorspace needs in the manufacturing sector influenced by productivity changes and the need for modern floorspace”*. IcenI again go on to discount the employment land forecasts for industrial land based on the labour demand scenario considered (paragraph 11.7 – 11.11).

2.2.17 The fact that other consultants such as IcenI, and Lichfield’s themselves, acknowledge the limitations of labour demand models, brings into question the accuracy of the Council’s employment land forecasts under Scenario 1B.

### 3. Labour Supply Methods do not provide a complete picture of future I&L demand

2.2.18 The labour supply method used in Scenario 3 of the EES does not provide a complete picture of future I&L demand, as housing growth at the local level has a limited relationship to I&L markets which have a more regional demand profile. This method is effectively saying that I&L demand is solely linked to the new incoming residents, which is not the case. I&L demand is also linked to the growth in freight movements, business to business relationships, companies reshoring back to the UK to avoid supply chain shocks, increased stockpiling requirements, and the fact that existing households too are increasingly spending more online. We consider some of these current and future growth drivers below, which will not have been accounted for in the demand estimates under Scenario 3.

### 4. 'Suppressed Demand' is Not Accounted For

2.2.19 When supply, as signalled by floorspace availability, is low, demand is 'suppressed' as prospective tenants can't find space in a market. 8.0% is typically referred to as the equilibrium level at a national level when supply and demand are broadly in balance (as sourced in publications such as the GLA's Land for Industry and Transport SPG (2020), and the BPF's Levelling Up – The Logic of Logistics Report). Below this level, available supply becomes tight and rents increase as strong occupier demand compete for limited available stock.

2.2.20 In Scenario 1B of the EES, an allowance of 8.0% is added to all positive floorspace requirements to reflect ideal levels of market vacancy in employment space. However, this is a one-off adjustment rather than a correction to the historic trend. As discussed in Section 4, Buckinghamshire's I&L market has been below the 8.0% equilibrium rate for all of the last decade (Figure 4.2), indicating it has been supply-constrained for a prolonged period of time, with not enough available supply for the market to operate efficiently. A confirming factor of this conclusion is that rental growth has outpaced inflation (see Figure 4.6 in Section 4). This is a by-product of strong occupier demand competing with one another for limited available stock. This competition pushes up rents.

2.2.21 The allowance of 8.0% added to all positive floorspace requirements in the EES's adopted scenario (Scenario 1B) does not take into account the historically supply-constrained nature of the I&L market in Buckinghamshire, and therefore projects forward a supply constrained trend.

2.2.22 Within the labour supply method (adopted in the Regulation 18 Local Plan), even this one-off adjustment applied in the labour demand scenario is not made; consequently, suppressed demand is also not accounted for under this scenario.

### 5. Current and Future Growth Drivers are not accounted for

2.2.23 A limitation of the labour demand scenario adopted in the EES is that it gives limited consideration - or a lack of clarity regarding any consideration - of current and future growth drivers that continue to underpin demand for I&L land. Meanwhile, the demand estimate projected under the labour supply method (adopted in the Regulation 18 Plan) is solely driven by the increase in housing and fails to take into account other demand

drivers. These growth drivers, discussed in more detail below, include:

- Growth in online retailing – Online retail sales have increased from 8.3% of all retail sales in 2011 to 27.2% in 2024<sup>6</sup>. In terms of pound spent online, the ONS estimated in 2011 that retail sales amounted to £5.8 billion. This level of online expenditure has increased 5 times to £29 billion in 2024<sup>7</sup>. The growth in online shopping has significant implications on future I&L demand given that e-commerce requires around 3 times the logistics space of traditional bricks-and-mortar retailers<sup>8</sup>. Internet shopping relies on increased choice for the consumer and also increased delivery speeds to a location of people's choosing. This means that more inventory is required to be located nearer to the general population. E-commerce is therefore one of the main growth drivers for the I&L sector. The sectors which are typically linked to e-commerce are Retail, Transportation and Warehousing, and Wholesale. These sectors accounted for over a third (36%) of total leasing demand in Buckinghamshire across 2015-2024<sup>9</sup>. This highlights the critical significance of the I&L sector in Buckinghamshire.
- Increased desire for next/same day deliveries – there is an increasing desire within our society for rapid parcel deliveries which serves as a key I&L growth driver. Retail Economics<sup>10</sup>, based on a survey of 2,000 UK households in 2024, found that UK consumers ranked next-day delivery as the most influential factor when deciding where to shop online for the second consecutive year. The same study highlighted that almost half of shoppers are open to paying for premium delivery in any circumstance (47%), with a further 33% open to paying a premium in 'certain' circumstances.
- Housing growth – The exponential growth in online retailing is both a function of the UK's increasing housing supply, and the fact that each individual house on average is spending more online. Between 2012 and 2024, the number of dwellings across Buckinghamshire has increased by 29,000 (+14%)<sup>11</sup>. Online retailing relies on increased choice for the consumer and also increased delivery speeds to a location of people's choosing. This means that more inventory is required to be located nearer to the general population which has been increasing. This in turn has meant that more warehouse space is required both by online retailers, but also traditional bricks-and-mortar retailers who are adapting their supply chains to compete. This trend will have been accounted for in Scenario 3 in the EES, but not the others.
- Growth in freight movements – Freight flows are another key driver of I&L floorspace demand. Freight arriving and leaving the UK needs to be sorted, packaged, and distributed via a network of freight handling infrastructure (i.e.

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<sup>6</sup> ONS Internet Sales as a Percentage of Total Retail Sales (ratio) (%)

<sup>7</sup> ONS Retail Sales Index time series (DRSI)

<sup>8</sup> Prologis (2016) Global E-Commerce Impact on Logistics Real Estate. Available at: <https://www.prologis.com/logistics-industry-research/global-e-commerce-impact-logistics-real-estate>

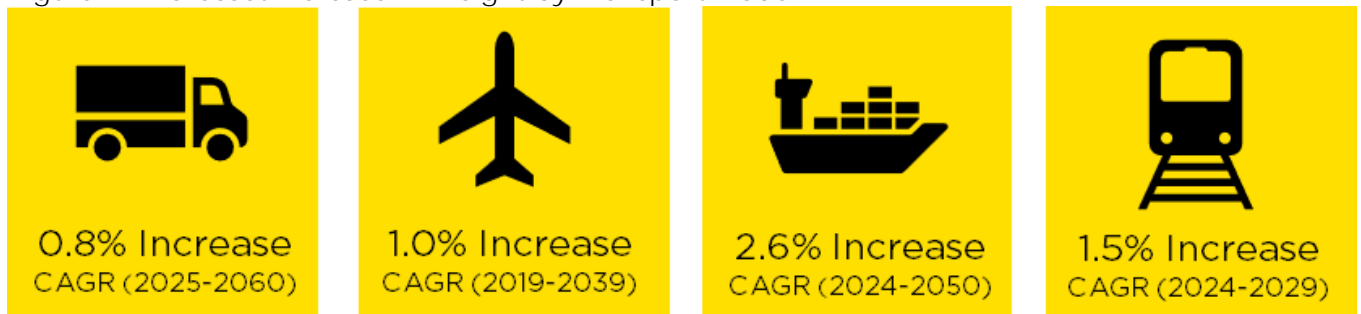
<sup>9</sup> CoStar Data (2025)

<sup>10</sup> 2024 Basket Abandonment Report – Retail Economics. Available here: <https://www.retaileconomics.co.uk/retail-insights-trends/thought-leadership-report-battling-online-retail-basket-abandonment>

<sup>11</sup> MHCLG (2025): Table 125 Dwelling stock estimates by local authority district, 2001-2023

ports, airports, rail freight interchanges and motorways), and conveniently located I&L premises in order to reach end customers. Freight volumes are forecast to grow significantly across all freight modes (Figure 2.2), which will increase demand for I&L floorspace in the UK.

Figure 2.2 Forecast Increase in Freight by Transport Mode



Source: DfT, MDS Transmodal for Network Rail, Boeing

- Near-shoring & re-shoring – Brexit and the Covid-19 Pandemic have highlighted the level of interconnectedness of international supply chains and their fragility when one or more links break. Companies have started building up greater resilience in their operating models by moving operations either back to the UK (re-shoring), or closer by (near-shoring) as a means to minimise future supply-chain-induced disruptions. Savills Big Shed Prospects 2025 notes that near-shoring continues to grow in importance against a backdrop of transportation bottlenecks, geopolitical tensions, and ambitious sustainability targets<sup>12</sup>. In the latest Nearshoring Index produced by Savills World Research, the UK ranks 10<sup>th</sup> globally in terms of attractiveness for near-shoring.

2.2.24 Given the lack of transparency regarding labour demand models, it remains unclear whether any of the above structural growth drivers have been considered within Scenario 1B.

### 6. Plot ratios applied are too high

2.2.25 The plot ratio of 40% used to convert I&L floorspace requirements to land estimates in Scenario 1B is considered to be too high.

2.2.26 From Savills experience, and based on recent developments across the country, a plot ratio of around 35% is considered more reflective of modern I&L occupier requirements. This is evidenced via the case studies presented below in Table 2.2, which illustrates that changes in the I&L sector means that occupiers are moving towards larger building footprints and requiring lower site coverage to allow for adequate yard space, cross-docking, sustainable urban drainage, and strategic landscaping. These modern occupier requirements imply a lower plot ratio, typically in the region of 30% to 35%, and so 35% is considered to be a more realistic, but still conservative figure. Actual ratios are frequently lower.

2.2.27 Based on this analysis we have used a 35% plot ratio to translate future floorspace need

<sup>12</sup> Savills Research (2024) Big Shed Prospects 2025. Available at: [https://research.euro.savills.co.uk/research\\_articles/229130/370249-0](https://research.euro.savills.co.uk/research_articles/229130/370249-0)

to land need as part of our demand modelling in Appendix A.

Table 2.2 Plot Ratio Case Studies

Local Authority	Site Name	Plot Ratio (%)
Bassetlaw	South of Haworth, A1 Industrial & Logistics Park	30%
Blaby	Optimus Point Plot 80	31%
Bristol	Ocado, St Modwen Park, Avonmouth	36%
Buckinghamshire	Symmetry Park Aston Clinton	31%
Central Bedfordshire	Symmetry Park Biggleswade	30%
Charnwood	Unit 2, Rowena Park - Rothley	33%
Doncaster	Nimbus Park	37%
Harborough	Magna Park South (Lutterworth) opt.1	29%
Harborough	Magna Park North (Lutterworth) Extension	29%
Mid Sussex	GAL at St Modwen Park Gatwick	34%
Newport	Amazon, St Modwen Park, Newport	26%
North Kesteven	St Modwen Park, Lincoln	32%
North Northamptonshire	West End, Raunds, Northamptonshire	29%
North Warwickshire	St Modwen Park, Tamworth	26%
North Warwickshire	Land North East of Sewage Works, Atherstone	36%
North Warwickshire	BIFT - Plot 7, Birch Coppice Business Park	34%
North West Leicestershire	Mountpark Bardon 2	35%
Oadby and Wigston	Wigston Industrial Estate	34%
Swindon	Symmetry Park Swindon	30%
Uttlesford	Land north of Taylor's Farm, Takeley Street	29%
Warrington	Mountpark Warrington Omega II	36%
Warrington	The Quadrant South	34%
		Average plot ratio = 32%

Source: Savills (2025)

### 7. *The most market facing demand approach has been disregarded*

2.2.28 The most market-facing methodology considered in the EES (Scenario 2B, which projects forward net absorption trends) has been discounted on the grounds that it overstates demand, given that it incorporates the strong Covid demand years (2020-2022). This, the EES indicates, distorts the results.

2.2.29 Savills however, considers the forward projection of net absorption, alongside appropriate adjustments and sensitivity testing, as a key component of its future demand modelling (see Section 5 and Appendix A).

2.2.30 Net absorption is a market-facing measure of demand, based on lease deals. It compares occupied space (move-ins) versus vacated space (move-outs) and therefore directly illustrates the balance between demand and supply from a market perspective. For example, positive net absorption in a given year suggests that demand is outpacing supply, while negative net absorption indicates weaker demand.

- 2.2.31 This leasing activity / the occupation of buildings is the truest market reflection of demand. It is occupiers who take leases over buildings, employ people, manufacture goods and distribute them hence why we consider net absorption to be the lead measure of demand. This is a view, which in our experience, is commonly shared amongst industrial agents, investors and the industry in general. It also better acknowledges the fact available land is a finite resource in England with numerous competing pressures for its use. Only when the existing stock of buildings is demonstrated to be not enough or fit for purpose should new land supply be considered.
- 2.2.32 As noted above, the EES discounts Scenario 2B on the basis that the results are distorted by recent strong demand in the sector, particularly during the three pandemic years (2020-2022). However this does not justify the exclusion of the most market-facing methodology considered.
- 2.2.33 We too recognise that the I&L sector has gone through a period of unprecedented growth in recent years. To account for this, and to ensure our modelling process is robust and balanced, we carry out a series of sensitivity tests to understand what will happen to future I&L demand should the sector's historic demand performance weaken significantly, despite us seeing no evidence of this occurring in reality.
- 2.2.34 One such sensitivity test involves excluding the Covid years (2020-2022) from our demand modelling. This approach ensures our demand projections are grounded in market signals, while also accounting for the possibility of a future softening in demand. Full details of our methodology, including the sensitivity tests undertaken, are provided in Appendix A.
- 2.2.35 It is also important to note that the EES uses a historic lookback period of 2014–2023 for net absorption under Scenario 2B, producing an average annual net absorption rate of 36,900 sqm, which is then projected forward. In contrast, Savills adopts a longer lookback period from 2012, and also incorporates 2024 data. This results in a lower annual average net absorption figure of 27,234 sqm (see Appendix A).
- 2.2.36 Accordingly, our modelling is based on a more conservative historic demand trajectory. However, as demonstrated in Section 5 and Appendix A, our approach also captures suppressed demand and the additional demand arising from continued growth in e-commerce.

### *8. Strong data centre need competing for I&L land*

- 2.2.37 Finally, and irrespective of the demand methodologies applied in the EES, it is important to recognise that the need to plan for dedicated I&L land, as distinct from data centres (which typically fall within the B8 use class), is likely to increase in significance across Buckinghamshire.
- 2.2.38 Given its proximity to the Slough Availability Zone (SAZ), Buckinghamshire, particularly the South Bucks area, is an increasingly attractive location for hyperscale data centres. Recent allowed and called-in appeals, including those at Woodlands Park (ref. PL/24/0754/OA) and Court Lane (ref. PL/22/4145/OA), have demonstrated the substantial scale of need associated with the SAZ. Consequently, land that might otherwise have been available for dedicated I&L uses is being taken up by data centre

development.

2.2.39 Accordingly, it is essential that the need for dedicated I&L land is properly planned for, using robust, market-facing methodologies. The role and implications of data centres are considered in further detail within the Applicant's accompanying planning representations.

2.3 A market signals approach is required to estimate future I&L land demand

2.3.1 Given the limitations of the labour demand and labour supply methodologies used in the EES, Savills considers an alternative, market-led approach to assessing future I&L demand should be considered. Such an approach should place greater emphasis on market signals, as set out in Paragraph 32 of the NPPF, to ensure the full scale of future need is properly captured, and which supplements the econometric approach taken by the Council.

2.3.2 Savills has developed a tried and tested methodology which takes a market signals approach, and which is more akin to Scenario 2B considered in the EES. We present the Savills methodology and the resulting demand estimates for I&L land in Buckinghamshire in Section 5 and Appendix A.

2.3.3 It should be noted that while not used in the EES, the council's appointed economic advisers Lichfield's are familiar with the Savills methodology, having considered it in a number of recent studies. For instance, in their 2025 Basildon Employment Land Needs Assessment, Lichfields consider demand under three scenarios: labour demand, labour supply, and market signals. While the latter is not explicitly referenced, it is evidently based on the Savills Suppressed Demand Approach. They have also used the Savills Suppressed Demand Approach in their Crawley Local Plan 2024-2040: Market Signals Assessment for Industrial and Warehousing Needs (2023). Both studies provide a demand estimate based on the forward projection of net absorption and a calculation to account for suppressed or unmet 'latent' demand.

2.3.4 The fact Lichfields have previously applied the Savills Suppressed Demand model in their own assessments gives further weight to its robustness and appropriateness for assessing I&L demand in Buckinghamshire. Further examples of where the Savills Suppressed Demand Approach has been applied are discussed in detail in Section 5.3.

2.3.5 The need to plan for I&L employment land using an appropriate market signals methodology is underscored by recent Government policy direction. For example, the updated NPPF (2024) explicitly recognises the growing importance of logistics to the modern economy and the need to plan for it appropriately. Paragraph 86 states that planning policies should:

*'Pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, **freight and logistics**'.*

*Savills emphasis in bold*

2.3.6 Similarly, the Government's Industrial Strategy (2025), recognises the importance of the freight and logistics sector, noting on page 89 that *'the freight and logistics sector makes a vital contribution to the UK economy and the competitiveness of the IS-8 (growth*

*sectors), ensuring that the right goods are in the right place at the right time'. It goes onto note that the government will deliver a new plan for freight and logistics so that the sector can 'continue to play its part in a growing economy'.*

- 2.3.7 Taken together, these policy statements demonstrate a clear and consistent recognition at the national level of the need to plan positively for I&L development. In this context, adopting a market signals-based approach represents the most appropriate and effective method for identifying and planning for future I&L land requirements.

### 3 Importance of the I&L Sector to the Local Economy

#### 3.1 Overview of the I&L Sector

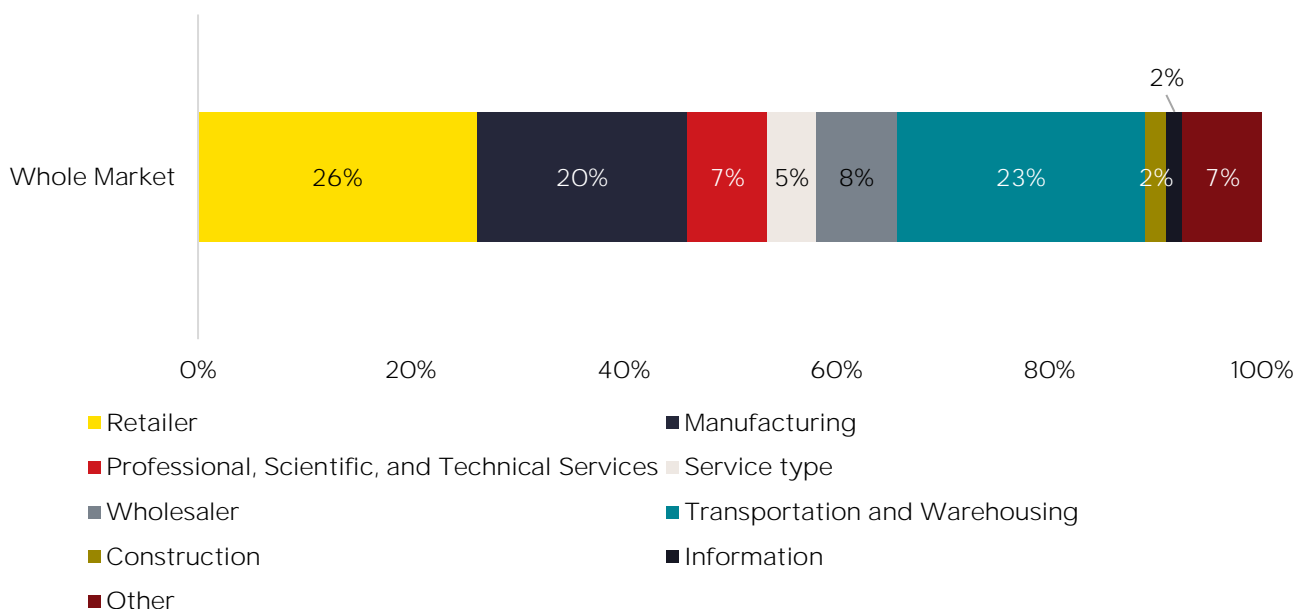
3.1.1 This section seeks to dispel some of the myths associated with the I&L sector, and demonstrate why its growth in Buckinghamshire should be facilitated.

3.1.2 The I&L sector is comprised of light industrial (formerly B1c use class now part of Class E), manufacturing (use class B2) and logistics (use class B8) activities<sup>13</sup>. The light industrial and manufacturing elements encompass businesses and organisations involved in the transformation of raw materials into finished products through mechanical, physical, or chemical processes. Logistics encompasses the storage and transportation of goods at all stages of the supply chain. These use classes together cover the diverse range of I&L companies that operate within England.

3.1.3 Fundamentally, I&L floorspace is flexible, enabling diverse occupiers to fit out the internal spaces of buildings to suit their specific operational requirements. As such, I&L premises serve a wide range of industries and occupiers, from traditional manufacturers and logistics firms, innovative research and development companies, to service oriented businesses, and more recently data centre occupiers. As a result, the sector has a highly diverse sectoral base, which supports economic resilience, job creation, and growth.

3.1.4 As illustrated in Figure 3.1, since 2019 almost every business sector of the economy has leased some I&L floorspace within England, including a notable share of floorspace leased from professional, scientific and technical activities, and service orientated sectors.

Figure 3.1 I&L floorspace leased by sector (2019-2024), England



Source: Savills, CoStar 2025

3.1.1 Given its diverse sectoral base, the I&L sector facilitates nearly all other economic

<sup>13</sup> See Reader Note at Section 1.3.

activities. Without this sector, the physical goods cannot be produced, nor transferred from the various freight modes (i.e. road, water, air and increasingly rail) to end customers, whether that be businesses, homes, or essential social infrastructure such as hospitals. This is considered in more detail in Section 3.6.

3.1.2 The sector's role as a key facilitator is evidenced by the fact that all eight growth sectors identified in the recent UK Industrial Strategy<sup>14</sup> are underpinned, to a greater or lesser degree, by I&L. This can be, either, directly through providing the physical premises for where these growth sectors will operate within, indirectly via the transport of their physical goods and data, or a combination of both.

3.1.3 Not only is the I&L sector a key facilitator of other sectors of the economy, but it also generates significant economic benefits in its own right. The sector employs at least 4.5 million people in the UK<sup>15</sup>, and produces £268 billion of Gross Value Added (GVA) annually<sup>16</sup>.

3.2 I&L is the fastest growing sector of the national economy

3.2.1 The logistics component of the I&L sector is the fastest growing segment of our economy, both in recent years and over the long term. Between 2015 Q1 and 2024 Q3 the number of jobs in the logistics sector grew by 22%, compared to only 9% across the economy as a whole (Figure 3.2).

3.2.2 A similar trend is evident when considering business generation, Between 2010 and 2024, the number of business premises within the logistics sector went up by 73%, over double the 30% growth rate across the economy as a whole.

3.2.3 The sector, supported by its highly skilled and diverse occupational profile (see Section 3.3), is also expected to see significant productivity growth in the coming years. While successive UK Governments have struggled to resolve the long-standing productivity challenges facing the national economy, the I&L sector is forecast to deliver significantly stronger productivity growth (43%) between 2021 and 2040. This compares with much lower growth in other major commercial sectors, including 27% for office-based employment and just 20% for retail (Figure 3.3). In effect, the value of outputs generated by the I&L sector, relative to input costs, is expected to grow at a substantially faster rate than the wider UK economy.

3.2.4 As a result, wage growth and wider investment within the sector will also likely outpace the wider economy. However, the positive contributions that the I&L sector can make will be restricted if supply fails to keep pace with demand.

<sup>14</sup> The UK's Modern Industrial Strategy (2025). Available at: <https://www.gov.uk/government/collections/the-uks-modern-industrial-strategy-2025>

<sup>15</sup> ONS (2024), Workforce Jobs by Region and Industry - Jobs in C: Manufacturing, and H: Transportation and Storage

<sup>16</sup> Oxford Economics (2024) GVA by Sector for Manufacturing and Transportation and Storage - UK

Figure 3.2 Logistics. Vs All Job Growth (2015 Q1-2024 Q3)

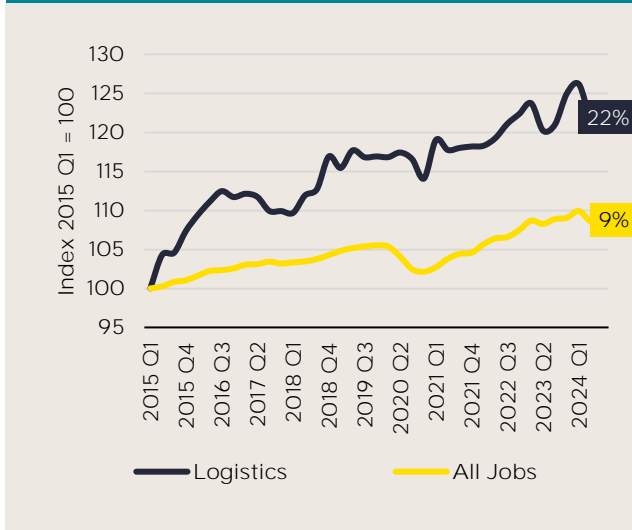
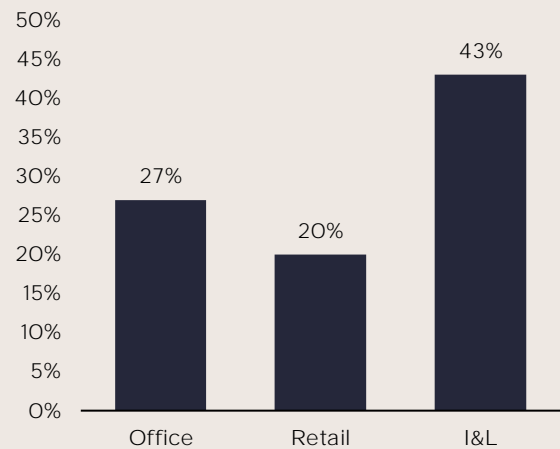


Figure 3.3 Expected Productivity Increases (2021-2040)



Source: Savills analysis of ONS and Oxford Economics data (2025)

### 3.3 I&L is a key employment growth sector in Buckinghamshire

3.3.1 The wider trends at the national level are reflected in Buckinghamshire. This is especially evident when comparing jobs growth in the I&L sector, versus that of other commercial uses such as office and retail, which are facing well documented structural challenges.

3.3.2 Within Buckinghamshire, the I&L sector<sup>17</sup> has experienced job growth of 24% between 2015 and 2023. This is in contrast to 0% growth in retail<sup>18</sup>, and a 5% decline in office-based sectors<sup>19</sup> over the same time period (see Figure 3.4). This clearly demonstrates that employment growth overall in Buckinghamshire (8% between 2015-2023) is being driven by the I&L sector. Considering just the logistics component of the I&L sector, the trend is even more pronounced, with job growth of 33% between 2015 and 2023.

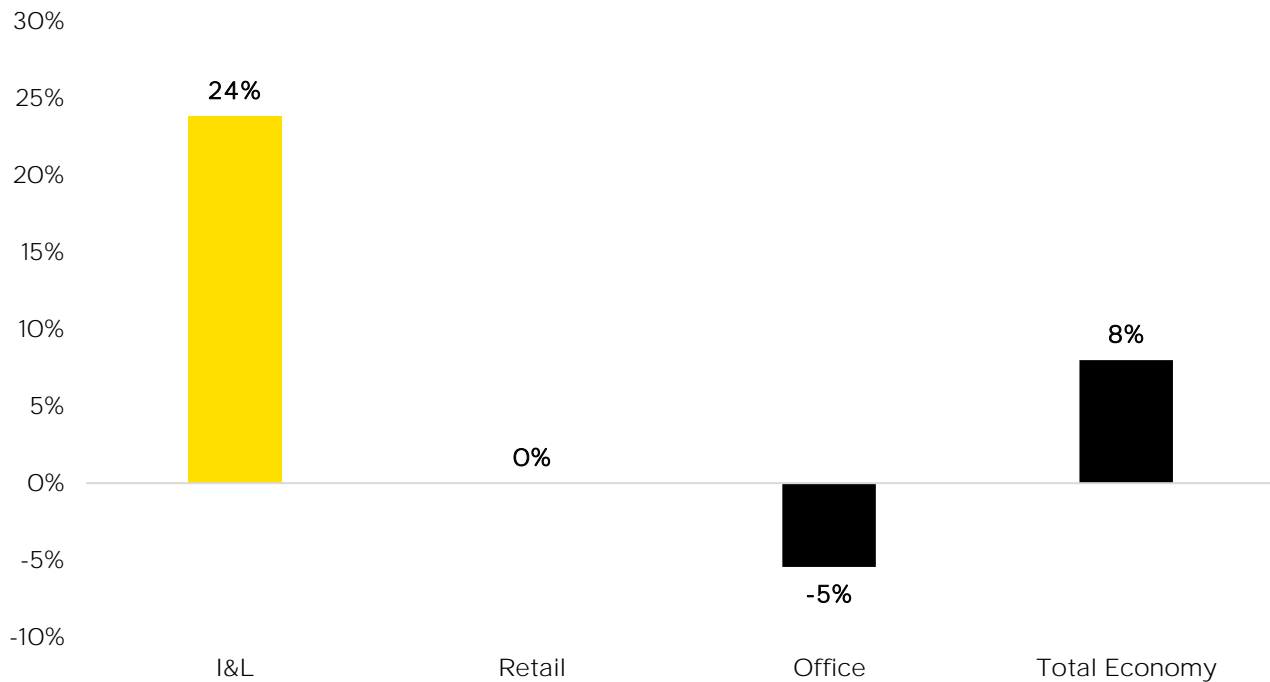
3.3.3 This demonstrates that the I&L sector (and in particular the logistics sub-sector) is a growing segment of the local economy with significant employment growth opportunities.

<sup>17</sup> SIC Code H (Transportation and Storage) and C (Manufacturing).

<sup>18</sup> SIC Code G (Retail)

<sup>19</sup> SIC Code J (Information and Communication), K (Finance and Insurance), L (Property), M (Professional, scientific and technical), N (Business administration and support services) and O (Public administration and defence).

Figure 3.4 Employment growth by sector in Buckinghamshire (2015-2023)



Source: BRES, Savills (2025)

### 3.4 Well paid, skilled and diverse jobs

3.4.1 Notwithstanding its importance in terms of employment and GVA contribution, the I&L sector is subject to a number of misconceptions about average pay levels, skills required, and types of premises it provides.

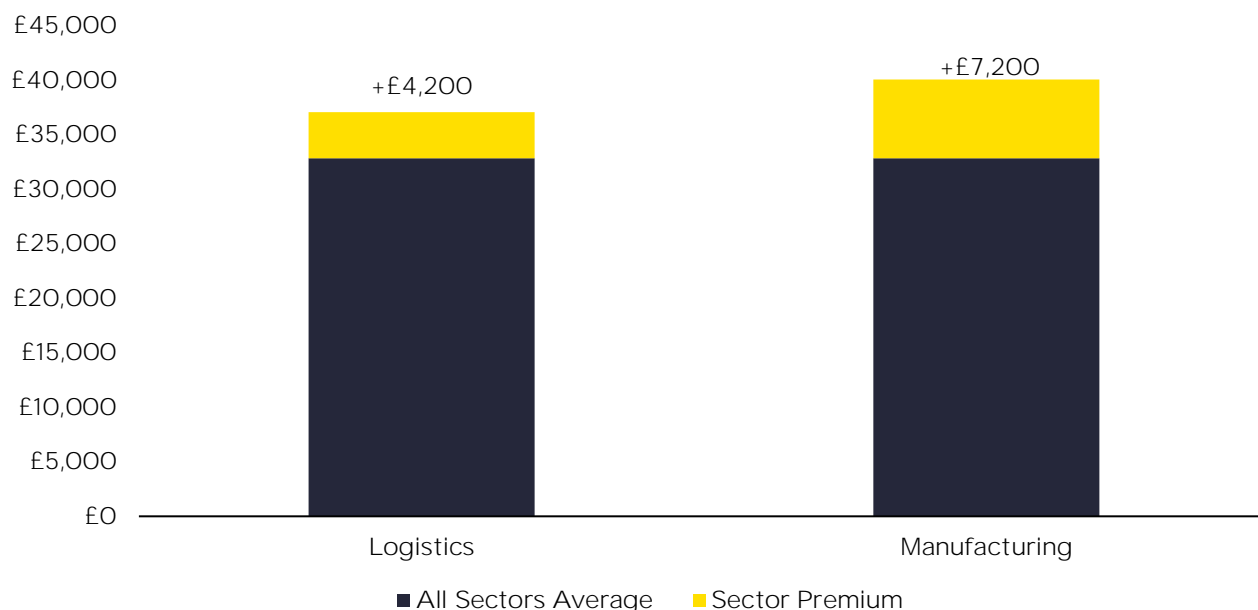
3.4.2 In Figure 3.5 below, we compare the logistics and manufacturing sectors' annual wages against the median pay in all sectors using the ONS data (October 2024) from the Annual Survey of Hours and Earnings ('ASHE'). It shows that in the South East region, jobs in logistics pay +£4,200 more than average per annum, and jobs in manufacturing pay +£7,200 more than average per annum<sup>20</sup>. Similar levels of salary outperformance exist across the UK. In addition, entry-level jobs in logistics are also better paid, with median annual pay being 47% higher than across jobs in the same occupational category according to a study by Frontier Economics<sup>21</sup>.

<sup>20</sup> ONS (2024) Annual Survey of Hours and Earnings ('ASHE') Table 5.7a Annual Pay Gross

<sup>21</sup> Frontier Economics (2022), The Impacts of Logistics Sites in the UK



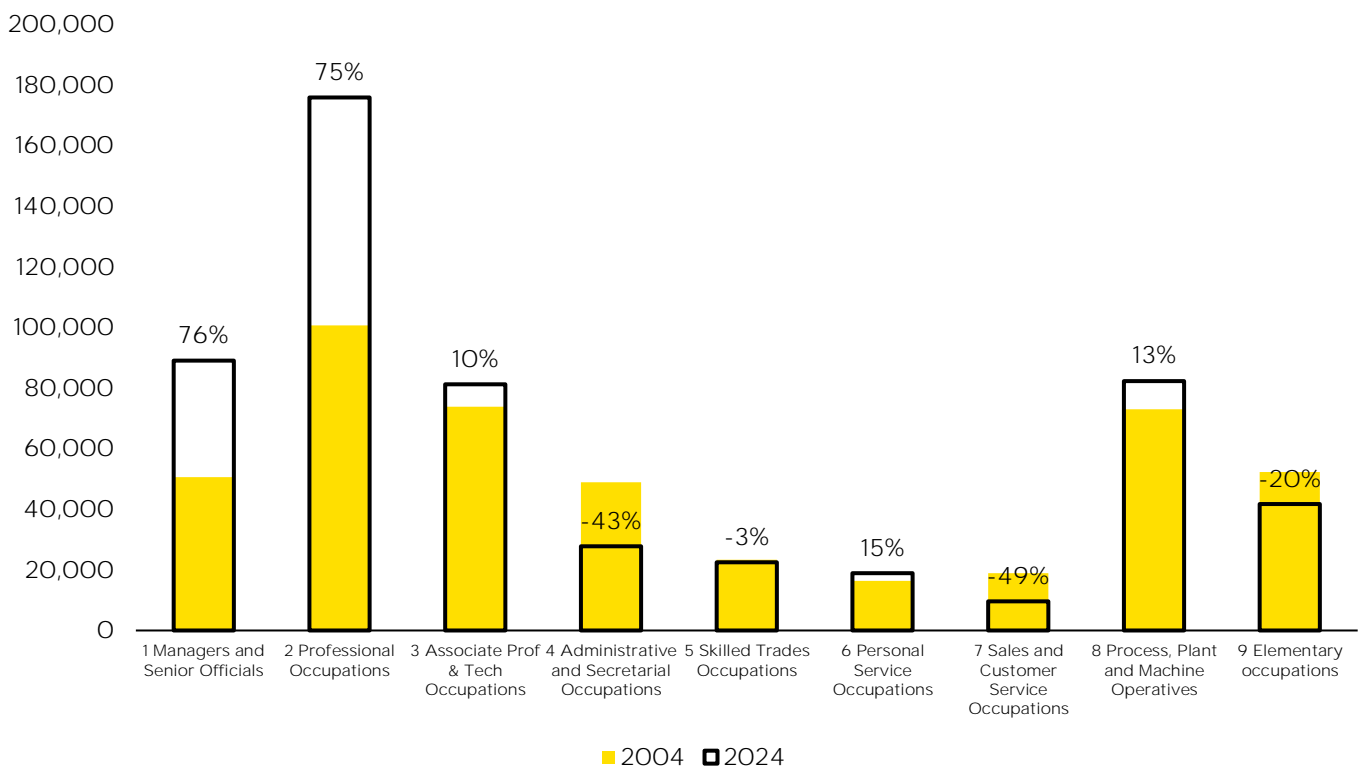
Figure 3.5 Annual Gross Earnings (2024) - Logistics/Manufacturing Vs. All Sectors - South East Region



Source: ONS ASHE (2025), Savills (2025)

- 3.4.3 Linked to the high pay levels in the logistics sector is the fact that the jobs it provides are becoming increasingly diverse and higher skilled. Figure 3.6 below shows the change in occupations in Transportation and Storage between 2004 and 2024 across the South East region.
- 3.4.4 Firstly, we can see that the share of higher-skill roles (Occupational Groups 1-3) has increased by 54%, with the biggest increase being in Professional Occupations, where the number of roles has increased by 75%. These roles are typically associated with higher-skilled engineering and technological professions in response to increased automation and robotics in the sector, and more advanced supply chain processes.
- 3.4.5 Secondly, there has been an increase in predominantly office-based roles (Occupational Groups 1, 2, 3, 4, 6, and 7), with occupations in these categories going up by 30% over the period 2004-2024. Many companies now seek to co-locate their office, R&D, and administrative functions with their production, manufacturing, and distribution operations, therefore bringing different occupations and specialisms together under one roof, leading to agglomeration and synergy benefits. Indeed, the colocation of office space alongside I&L uses is an approach the Applicant is expected to take at the Subject Site (Section 6).

Figure 3.6 Occupational Distribution in the Transportation and Storage (2004 Vs. 2024) - South East Region



Source: ONS, APS, Savills

3.4.6 This increasingly diverse range of occupations in logistics also enables it to re-employ people who have lost their jobs in other sectors of the economy. For instance, a person that may have lost their job as an engineer or IT consultant within an office-based firm, can now find roles with a similar skill set in I&L. This is linked to the sector becoming more sophisticated, as well as the complexity and reach of I&L supply chains.

### 3.5 Accessible employment opportunities

3.5.1 The logistics component of the I&L sector is also particularly good at providing employment opportunities to those that may not otherwise be in work. Based on a recent independent survey undertaken by YouGov, Frontier Economics found that 20% of people currently in logistics were previously unemployed, and that one in four within this group were long-term unemployed<sup>22</sup>.

3.5.2 Further to this, it is also important to note that while the sector is becoming increasingly higher skilled with a diverse range of occupations, many jobs within the logistics sector do not require formal qualifications in the same way as other sectors. Figure 3.7 below shows the average qualification quotient of workers by sub-sector, where a larger quotient represents more qualified workers on average. The largest sub-sector of the logistics sector (Transport and Storage) has on average the least qualified employees.

<sup>22</sup> Frontier Economics (2022) The Impact of Logistics Sites in the UK. Available at: <https://logistics.org.uk/CMSPages/GetFile.aspx?guid=d3e3d23c-2dca-4b0a-8406-0d126c71eb4d&land=en-GB>

3.5.3 This indicates that the logistics sector is less reliant on formal qualifications which can be both costly and time consuming for employees to obtain. This will enable the Subject Site to contribute more effectively to the local economy of Buckinghamshire by providing employment opportunities for unemployed or lower-skilled individuals, many of whom can be upskilled through on-the-job training, a key characteristic of the logistics sector.

Figure 3.7 Average Qualification Quotient of Workers



Source: ONS Census (2021)

3.5.4 The increasingly diverse range of occupations within the logistics sector (see Figure 3.6), combined with its relatively low entry requirements (see Figure 3.7), represents a particularly important consideration in the current labour market context. Like many parts of the country, Buckinghamshire continues to experience elevated levels of economic inactivity and unemployment compared to the pre-Covid-19 period. The Claimant Count, which measures the number of people claiming benefits principally for the reason of being unemployed, provides a useful indicator of this trend.

3.5.5 As of July 2025, the Claimant Count across Buckinghamshire stood at 11,025 individuals, almost double the level recorded in March 2020, representing an increase of 5,485 claimants (or approximately 99% higher)<sup>23</sup>. This sharp rise highlights the ongoing

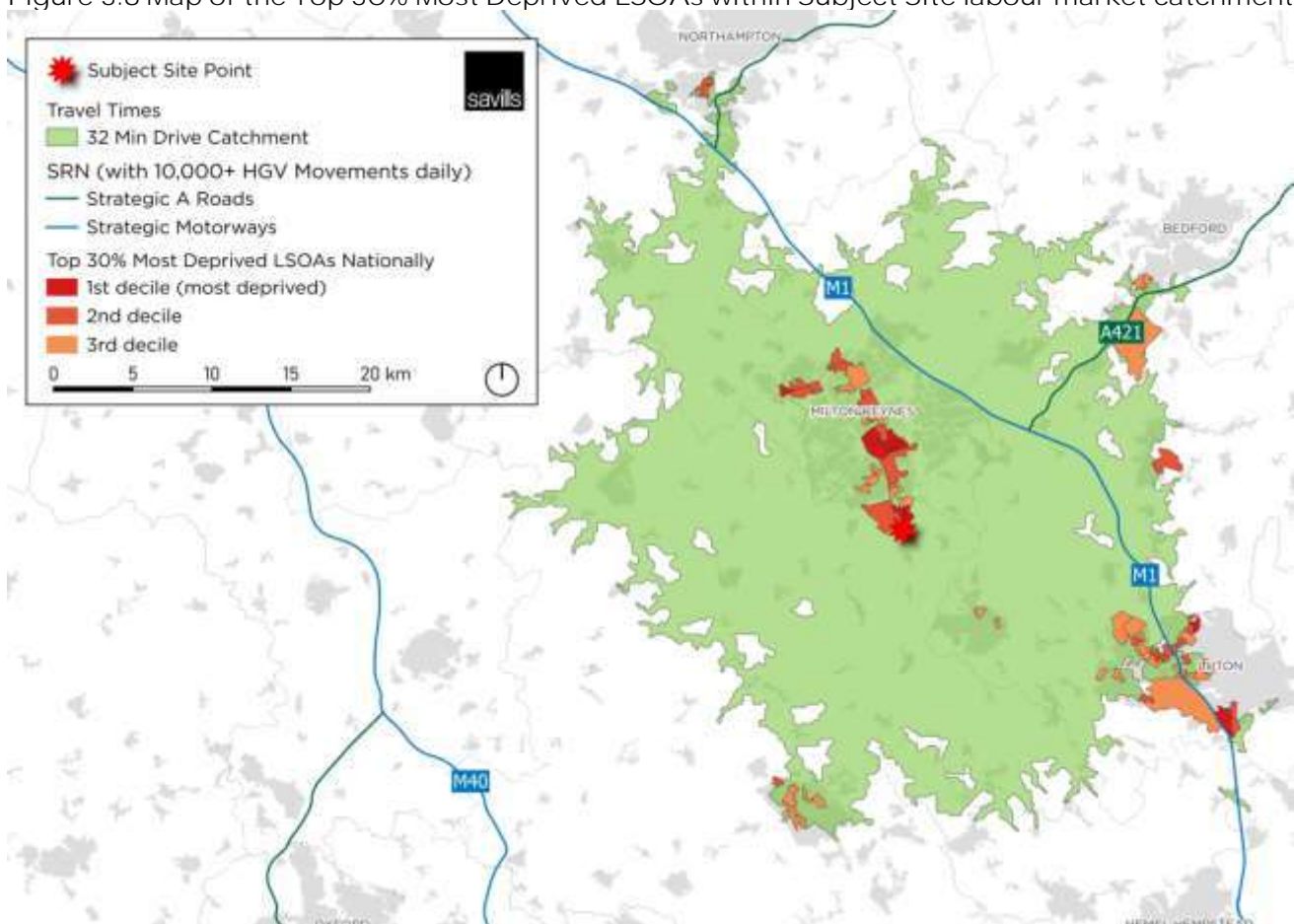
<sup>23</sup> ONS Claimant Count by Sex and Age (2025)

challenges facing sections of the local labour force, including those with limited qualifications or disrupted employment histories.

3.5.6 The fact that the I&L sector is a strong employer of people without high levels of academic qualifications allows it to provide accessible employment opportunities. This is particularly notable given the deprivation levels in proximity to the Subject Site. Figure 3.8 below shows that within a 32-minute drive time<sup>24</sup> from the Subject Site (which represents an appropriate labour market catchment as evidenced in Section 6), there are numerous neighbourhoods that score among the top 30% most deprived areas in England.

3.5.7 Typically many people in deprived areas are unable to find employment opportunities as a result of a lack of formal qualifications. I&L development can therefore help to provide employment opportunities to these residents, tackling joblessness, deprivation, and improve health outcomes for residents of Buckinghamshire

Figure 3.8 Map of the Top 30% Most Deprived LSOAs within Subject Site labour market catchment



Source: IMD 2019, Savills 2025

3.6 The I&L Sector plays an important supply-chain role in the economy

3.6.1 The sector's role in facilitating other sectors means it supports significant indirect employment. As discussed above in Section 3.1, I&L premises are a critical link in all supply chains alongside the key freight modes that allow goods to enter, leave, and move around

<sup>24</sup> ONS User Request Data – 2018: TRVTME Usual home to work travel time (minutes) by local authority

the country (i.e. ports, airports, rail freight interchanges, and motorways), underpinning nearly all economic activity. Like warehouses, these freight handling facilities generate employment to drive the planes, trains, and boats, as well as jobs involved in their maintenance and repair. Jobs are also created at ports, airports, and rail freight interchanges as part of their operation, as well as retail services where goods are sold. The analysis of ONS Type 1 FTE Multipliers for the Warehousing sector suggests that for every 10 new warehousing jobs created, another 7 to 12 jobs are created off-site across the wider supply chain. Figure 3.9 below provides a simplified graphic representation of the I&L sector's role within supply chains, illustrating its employment generation (either directly or indirectly) at every stage.

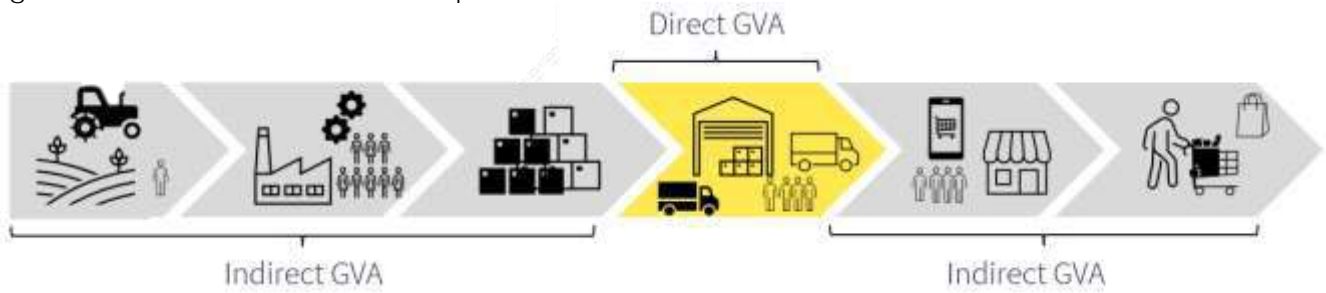
Figure 3.9 I&L Sector's Role with Supply Chains



Source: Savills (2025)

3.6.2 Another vital component of the I&L sector's 'economic story' is 'Indirect GVA'. Indirect GVA captures the impact that the logistics sector has on other segments of the economy. For example, the services that a sector procures in support of its business activities trigger a GVA contribution by its suppliers, suppliers of suppliers, and so forth, up the entire value chain. In simple terms, the logistics sector stores and distributes material and products used or sold by other companies as part of their operations. These relationships are shown in Figure 3.10 below.

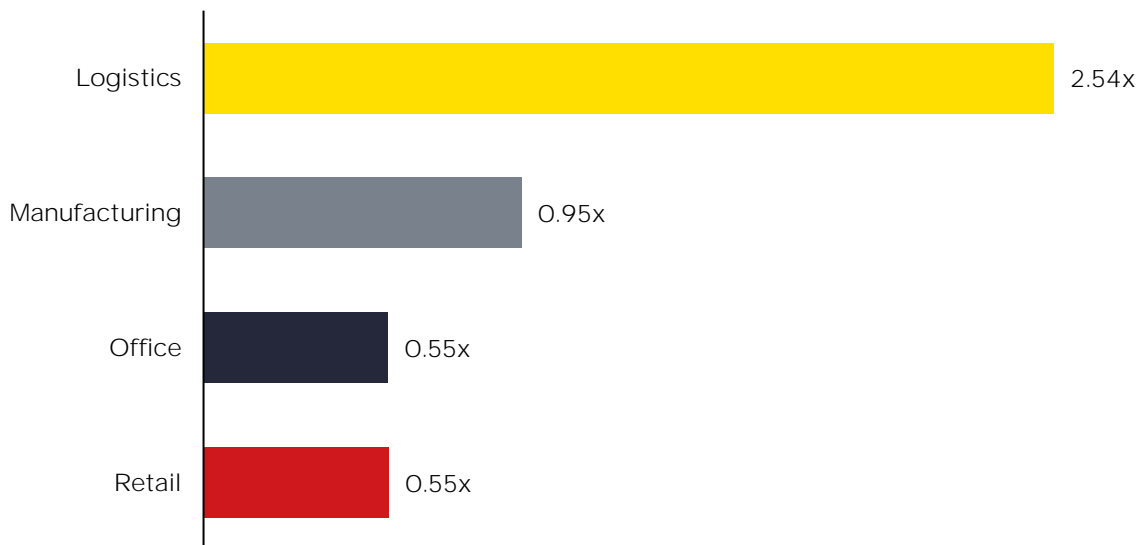
Figure 3.10 Indirect GVA and I&L Operations



Source: Savills

3.6.3 These inputs and outputs generate economic value that logistics has played a vital role in helping to realise. When we quantify the ratio between the direct and indirect GVA generated by industrial sectors in the UK we can see the true value of the logistics sector. The indirect GVA generated by the logistics sector in the UK is 2.54 times higher than its direct GVA contribution. This is much higher than the indirect GVA generated by manufacturing (0.95), office (0.55), and retail (0.55) sectors<sup>25</sup> (Figure 3.11 below). This illustrates the importance of logistics in facilitating other sectors of the economy. To impede its growth would undermine growth in other sectors of the economy too.

Figure 3.11 Indirect GVA Generation by Final Product



Source: ONS (2022)

3.6.4 The preceding analysis clearly demonstrates the importance of facilitating growth in Buckinghamshire’s I&L sector. The sector generates high-quality, well-paid, and accessible employment opportunities for local residents, enabling Buckinghamshire to benefit from one of the strongest-performing commercial sectors in the national economy, while helping to reduce local unemployment and deprivation. The Applicant’s proposals for the Subject Site (see Section 6) present a clear opportunity to realise these benefits.

<sup>25</sup> ONS Input Output Analytical Tables (2022)

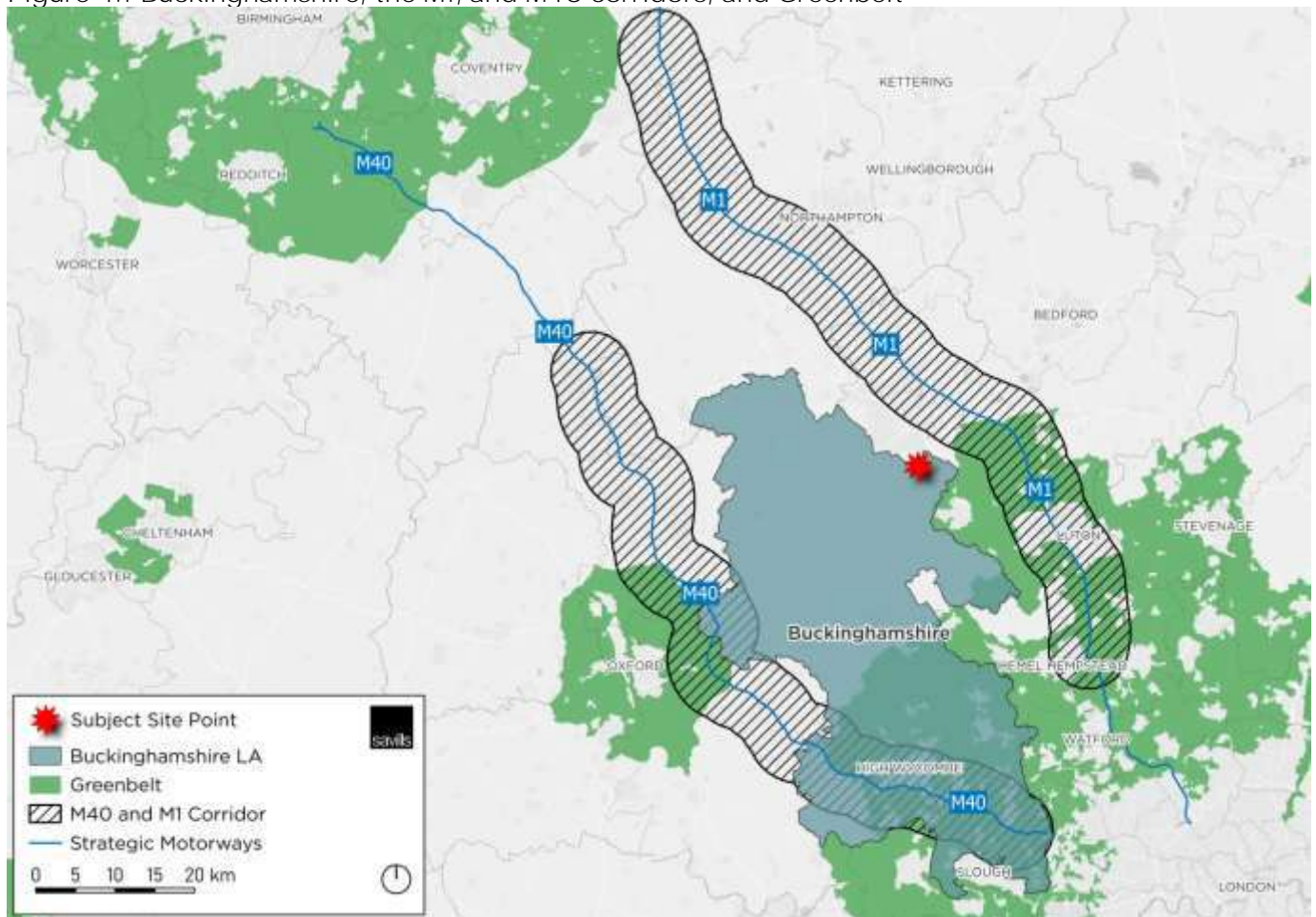
- 3.6.5 This is a view which is consistent with many of the findings of the Council's Modern Economic Study (2025), which is supporting evidence to the emerging Local Plan. For example, the Study notes at paragraph 4.27: *'considering the sectoral trends and Buckinghamshire's locational advantages, in addition to evidence of constrained supply, it is expected that the sector will continue to be a key driver of the local economy and will need to ensure it can adapt to the rapid pace of technological advancement'*.

## 4 I&L Market Assessment

### 4.1 The Study Area

- 4.1.1 This section provides an objective assessment of the market strength for I&L development in Buckinghamshire, where the Subject Site is located. The analysis draws on a range of market demand and supply indicators.
- 4.1.2 To provide additional context, we have also examined key demand and supply dynamics within a 5 km corridor (2.5 km either side) of segments of the M1 and M40 motorways – two nationally significant movement corridors located to the east and west of the Subject Site respectively (see Section 6). This comparative benchmarking approach enables a more comprehensive understanding of the Subject Site’s relative market position within the wider regional I&L landscape, particularly in relation to two established and high-performing I&L locations that occupiers are likely to seek to service or locate near to.
- 4.1.3 For the purposes of this assessment, the M1 Corridor has been defined as extending from Hemel Hempstead northwards towards Rugby, encompassing key logistics markets within neighbouring authorities including West Northamptonshire, Milton Keynes, and Central Bedfordshire. The M40 Corridor has been defined as extending from Uxbridge in the south to Banbury in the north, intersecting the adjoining local authority area of Chiltern. Together, these corridors represent two of the most strategically important I&L locations in southern England, offering direct access to major population centres and national distribution routes. Figure 4.1 illustrates the location of Buckinghamshire in relation to these two transport corridors and highlights the strategic position of the Subject Site between them. For context we have also mapped the Greenbelt in Figure 4.1. We consider the strategic advantages of the Subject Site in further detail in Section 6.

Figure 4.1 Buckinghamshire, the M1, and M40 corridors, and Greenbelt



Source: Savills (2025)

## 4.2 Market supply and demand indicators

- 4.2.1 The consideration of market signals is a key requirement of the NPPF (Paragraph 32) for underpinning the preparation and review of all Local Plan policies. As we discussed in Section 2, one of the main concerns with the Council’s employment evidence (the 2025 EES) is that its demand modelling has limited regard to market signals.
- 4.2.2 Table 4.1 below presents a summary of the key market supply and demand indicators for Buckinghamshire, along with the M1 and M40 corridors defined above.
- 4.2.3 Buckinghamshire’s I&L market comprises approximately 2.1 million sqm of existing floorspace. Within this, the former local district of Aylesbury Vale<sup>26</sup>, where the Subject Site is located, accommodates the largest share, accounting for around 45% of Buckinghamshire’s total I&L inventory. By comparison, the M1 Corridor we have defined supports an estimated 4.6 million sqm, while the M4 Corridor accommodates approximately 1.7 million sqm of I&L floorspace.
- 4.2.4 The overall I&L availability rate in Buckinghamshire is 3.9% (2024), which is lower than the corresponding availability rates recorded across the M1 (7.6%) and M40 (6.3%)

<sup>26</sup> In 2020 the Buckinghamshire local authority was formed via the merging of the four former district councils of Aylesbury Vale, South Bucks, Wycombe and Chiltern. The Applicant’s Subject Site is located in the former district of Aylesbury Vale.

Corridors. Availability rates across all three geographies are below the level at which a market is considered to be broadly in balance between supply and demand. This is defined as the 8% equilibrium rate and is discussed in further detail below and Appendix A. This illustrates a set of supply constrained markets.

4.2.5 Rental growth has been strong in the three geographies considered between 2012 and 2024, growing by 111% in Buckinghamshire, 98% in the M1 Corridor and 107% in the M40 Corridor. These growth rates are far higher than the rate of inflation over the same time period (39%), indicating strong demand is competing for limited available stock.

4.2.6 Each of these indicators are discussed in more detail in the following sub-sections.

Table 4.1 Summary of key market demand and supply signals

Local Authority	Inventory (2024) (sqm)	Availability Rate (2024) (%)	Rental Growth (2012-2024)
Buckinghamshire	2,092,199	3.9%	111%
M1 Corridor	4,565,257	7.6%	98%
M40 Corridor	1,657,535	6.3%	107%

Source: CoStar, Savills 2025. NB: Figures may not sum due to rounding

### 4.3 Buckinghamshire is supply constrained

4.3.1 At the national level, 8% availability across all size bands is commonly referred to as the level where a market is broadly in balance (i.e. equilibrium frictional capacity) in terms of supply and demand, as sourced in publications such as the:

- GLA's Land for Industry and Transport Supplementary Planning Guidance (SPG) (2012);
- London Plan (2021); and
- British Property Federation's ('BPF') 'Levelling Up – The Logic of Logistics' Report.

4.3.2 The 8% level is also referenced in the EES (2025). For example at paragraph 4.39 the EES states: 'A vacancy rate of around 8% is typically considered to represent a 'normal' market equilibrium whereby supply and demand are broadly in balance'. The labour demand model adopted in the EES also makes an allowance of 8% for additional floorspace to reflect 'normal levels of market vacancy in employment space' (paragraph 5.26). The application of the 8% equilibrium is therefore supported by the Council's economic advisers.

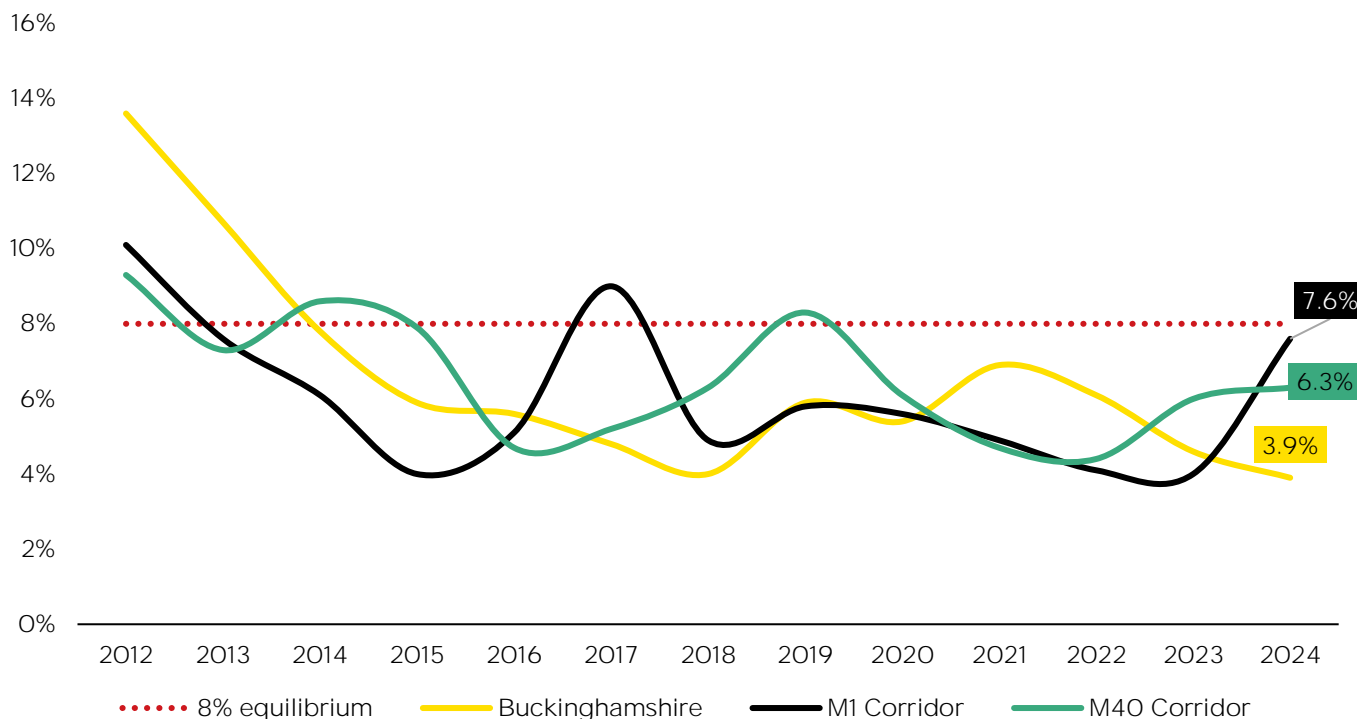
4.3.3 Below this level, available supply becomes tight and rents increase as strong occupier demand compete for limited available stock.

4.3.4 As shown in Figure 4.2, availability in Buckinghamshire, and the M1 and M40 corridors is below the 8% equilibrium and in 2024 stood at 3.9%, 7.6% and 6.3%, respectively.

4.3.5 With specific regard to Buckinghamshire, availability has been below the 8% equilibrium level for every year since 2014. This shows that the I&L market has been supply-constrained for a considerable period of time which in turn suppresses demand as not all occupiers can find space to meet their needs. As a result, they are either forced to remain

in their existing premises, even if not ideal for their operational requirements, or alternatively have to leave the area to find suitable premises elsewhere, taking the jobs and investment they generate with them.

Figure 4.2 I&L Availability Rate (2012-2024)



Source: CoStar, Savills 2025

4.3.6 Within Buckinghamshire, the picture is even more stark when considering the respective availability for large units (9,300 sqm +), versus small (0 – 2,800 sqm) and mid-box units (2,800 – 9,300 sqm)<sup>27</sup>. Within Buckinghamshire, in 2024, availability for large units was zero. While based on 2025 YTD data it has risen to 2.8%, this is still significantly below the 8% equilibrium level and below the availability rates for small (5.2%) and mid-box units (4.1%). While availability for large units did rise above the 8% equilibrium, peaking at 10.8% in 2021, the fact availability has fallen back quickly again illustrates that these large units were quickly taken up, highlighting strong demand for this market segment.

4.3.7 This analysis is presented in Figure 4.3, and illustrates that supply constraints in Buckinghamshire are particularly acute for large I&L units, and have been for the last decade.

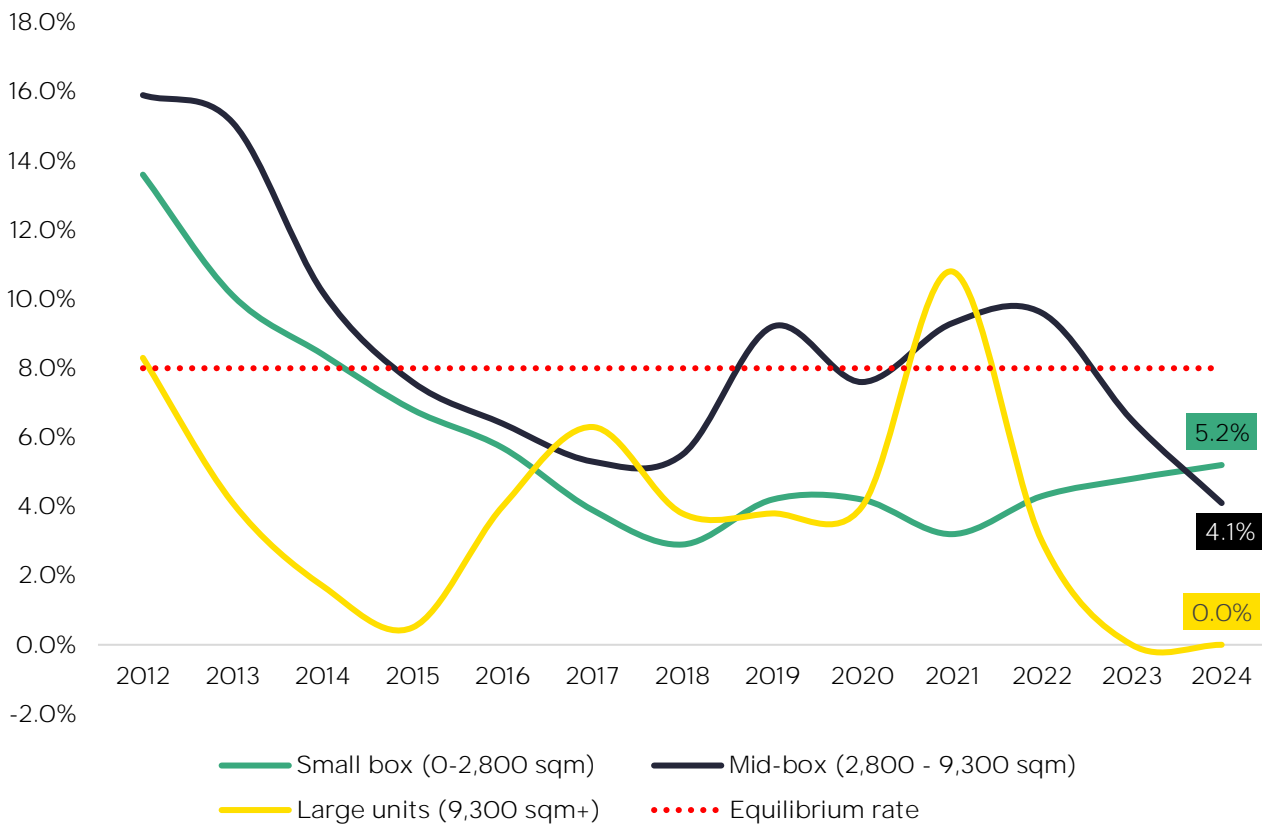
4.3.8 The supply constrained nature of Buckinghamshire’s market is recognised by the Council’s economic advisers in the Buckinghamshire Modern Economic Study (2025), which is supporting evidence to the emerging Local Plan. This is evidenced by the following extracts:

<sup>27</sup> These are industry standard size bands used in the UK to classify small, mid-box and large I&L units. This has been confirmed by the Savills Research team and our Industrial Agency teams

- Paragraph 4.26: *'The area (Buckinghamshire) is perceived as an attractive industrial location with a consistently tight supply of industrial space across all sizes and types, with an emphasis on larger-scale units'*.
- Paragraph 4.31: *'Buckinghamshire is well-connected by road, and as such has an established presence of freight and logistics firms. Over the past decade, there have been net gains in distribution floorspace in Buckinghamshire, with strong take-up and low levels of availability, indicative of a high level of demand for both freight and logistics services'*.
- Paragraph 8.31: *'Looking ahead, strong take-up and low availability means that Buckinghamshire has just 0.6 to 0.7 years of available supply of industrial floorspace, including distribution floorspace'*.

4.3.9 The analysis in Figures 4.2 and 4.3 support this view.

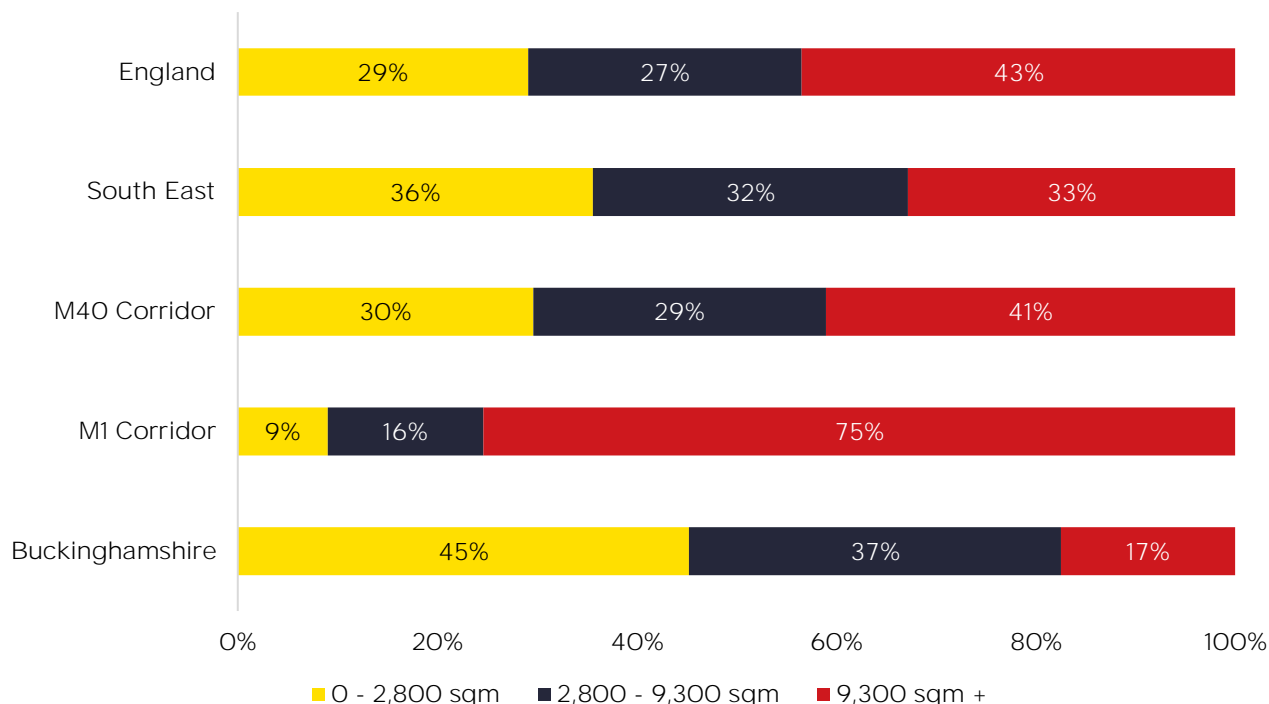
Figure 4.3 Buckinghamshire I&L Availability by size band (2012-2024)



Source: CoStar, Savills 2025

4.3.10 The lack of availability in large units in Buckinghamshire is not surprising when we consider the I&L inventory share by size band. Figure 4.4 illustrates that Buckinghamshire has a significantly smaller proportion of its inventory in large units (17%) compared to the M1 and M40 Corridors (75% and 41% respectively), wider South East region (33%) and national level (43%). Concurrently, almost half of inventory in Buckinghamshire is in small units, significantly higher than the corresponding shares for the comparator geographies.

Figure 4.4. Inventory share by size band (2025 YTD)



Source: CoStar, Savills 2025

4.3.11 While we would expect the M1 and M40 Corridors to support a greater share of large units given their strategic role within the national logistics network, the fact that Buckinghamshire’s I&L inventory is more heavily skewed towards smaller units, even when compared to the regional and national average, is notable given recent market trends.

4.3.12 Indeed, the past decade has witnessed a marked preference for big-box units, driven by robust demand and investor inclination. These larger units offer advantages such as lower build and management costs, coupled with occupiers boasting stronger financial covenants. Consequently, larger units have emerged as the more viable option for developers and investors alike at the expense of smaller units, often helping to fund further infrastructure investment at strategic employment sites.

4.3.13 The shift in occupier demand towards larger units is evidenced by the fact that the share of total leasing demand (net absorption) for large units above 9,300 sqm at the national level has increased from 42% in the period 2012-2018, to 79% in the period 2019-2024. This analysis is illustrated in Table 4.2.

Table 4.2 Share of Total Net Absorption by Size Band in England, 2012-2024

Time Period	Small units (0 – 2,800 sqm)	Mid-box units (2,800 sqm – 9,300 sqm)	Large units (9,300 sqm +)
2012-2018	30%	28%	42%
2019-2024	5%	16%	79%

Source: CoStar, Savills 2025

4.3.14 The focus of the Applicant’s Proposed Development at the Subject Site, while flexible at this stage, will be the delivery of a range of large scale I&L units over the 9,300 sqm threshold.

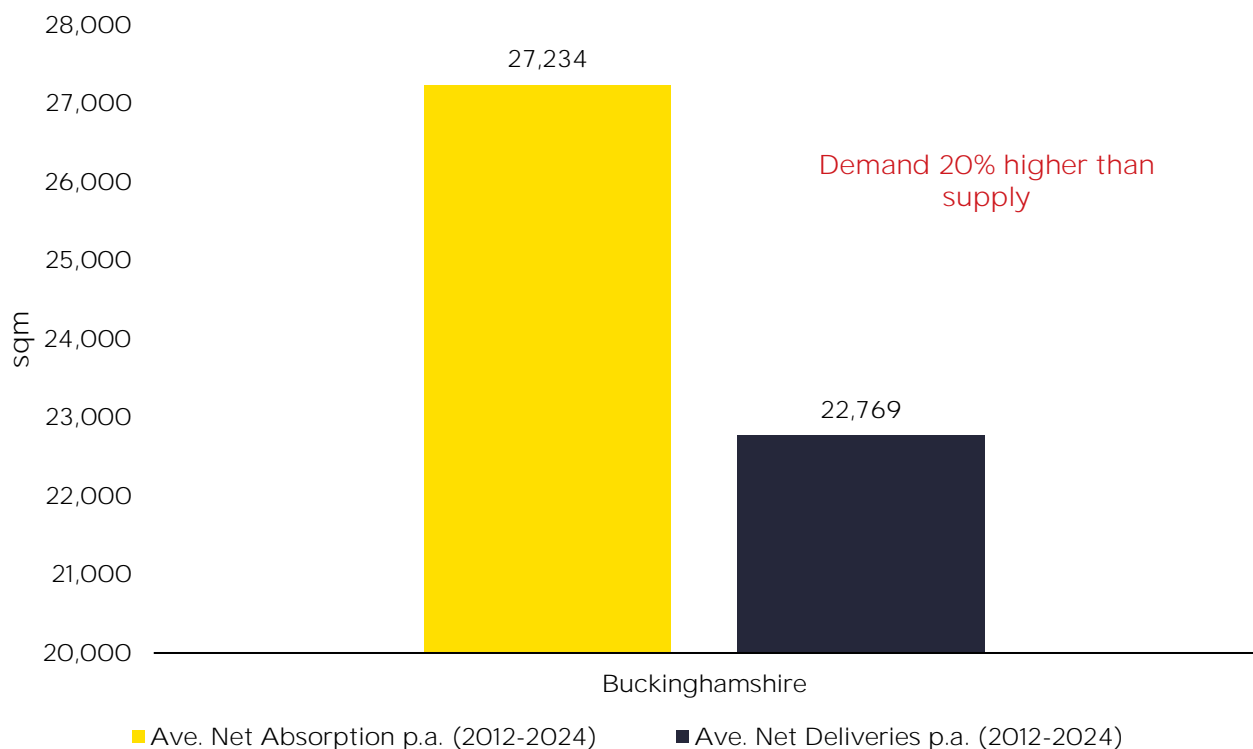
4.3.15 Consequently, the Applicant’s Proposed Development is responding directly to market signals and the lack of supply in large units in particular. Further details regarding how the Proposed Development may come forward is provided in Section 6.

### 4.4 I&L demand is exceeding supply

4.4.1 As discussed in Section 2, net absorption is a leading measure of demand based on lease deals. It compares occupied space (move-ins) versus vacated space (move-outs). On the other hand, net deliveries is a measure of supply and registers the change in inventory (floorspace) related primarily to new developments.

4.4.2 Figure 4.5 below show that over the last 13 years (2012-2024), average levels of net absorption (demand) have exceeded the average levels of net deliveries (supply) of I&L floorspace across Buckinghamshire by 20%. This demand / supply imbalance explains why availability has been below the 8.0% equilibrium across Buckinghamshire for the last decade (Figure 4.2). New I&L development at the Subject Site will help to address this demand/supply imbalance by delivering much needed new I&L floorspace

Figure 4.5 Buckinghamshire Net Absorption and Net Deliveries p.a. (sqm) (2012-2024)



Source: CoStar, Savills 2025

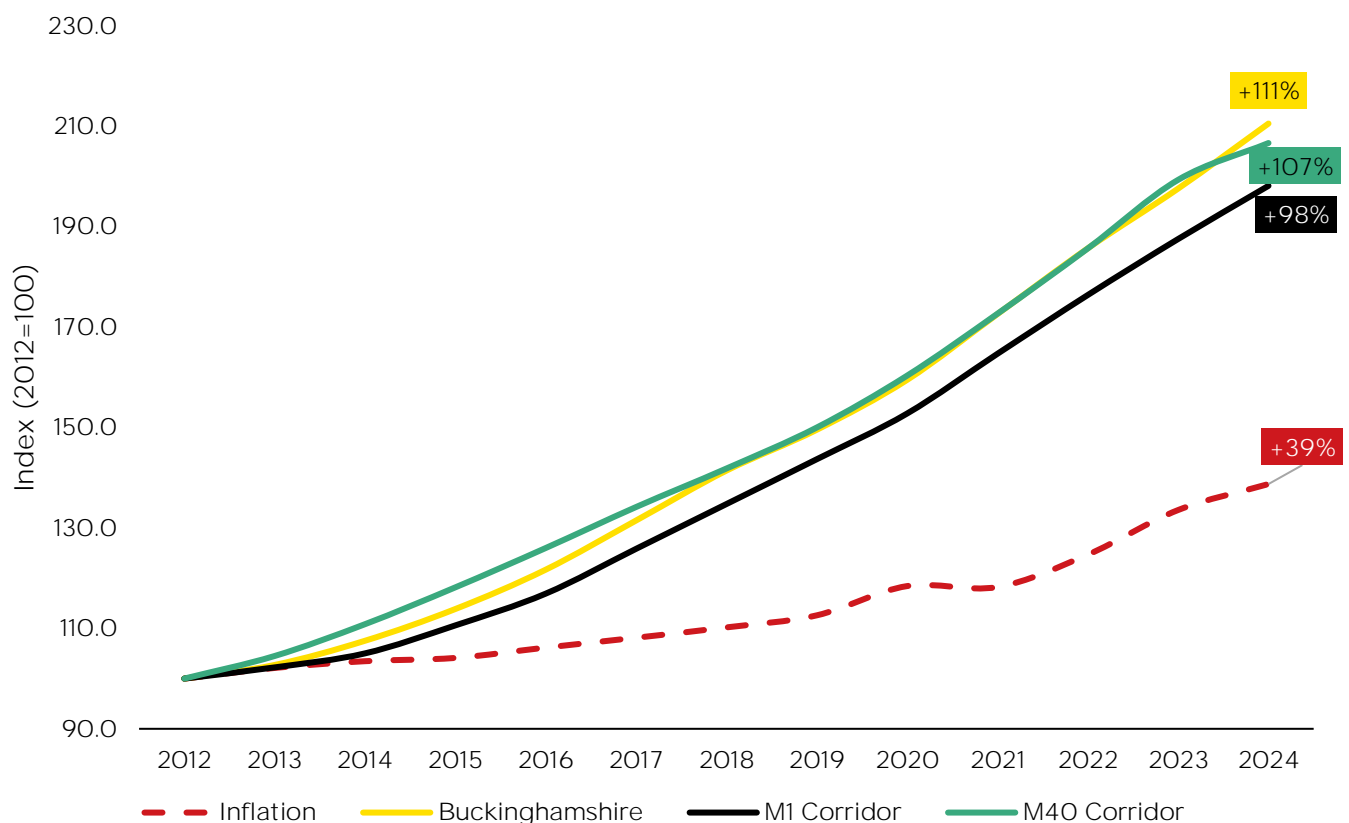
### 4.5 Strong rental growth

4.5.1 Another key market indicator for understanding the relationship between supply and

demand is rental growth. When demand outstrips supply, rental growth is typically higher as occupiers compete for limited available stock. This in turn drives up rents. Conversely, when there is sufficient supply to accommodate demand, rental growth is lower, typically tracking inflation more closely.

4.5.2 The lack of available floorspace overall in Buckinghamshire and the two motorway corridors (see Figure 4.2) has caused rents to grow at a rapid rate. Figure 4.6 shows that rents in Buckinghamshire, and the M1 and M40 Corridors grew by 111%, 98% and 107% respectively between 2012 and 2024 – well over double the rate of inflation (39%) over the same period.

Figure 4.6 Rental Growth Vs. Inflation (2014-2024)



Source: CoStar, Savills 2025

## 4.6 Lack of good quality I&L stock

4.6.1 The I&L sector is increasingly becoming a key driver of environmental sustainability, with modern I&L buildings delivering on ESG objectives across all stages of a property's life cycle. At a micro level, occupiers are being driven by strategic decision-making and a desire to improve the ESG credentials of their real estate portfolios, not only to support the decarbonisation of the sector, but also from an efficiency and cost saving point of view.

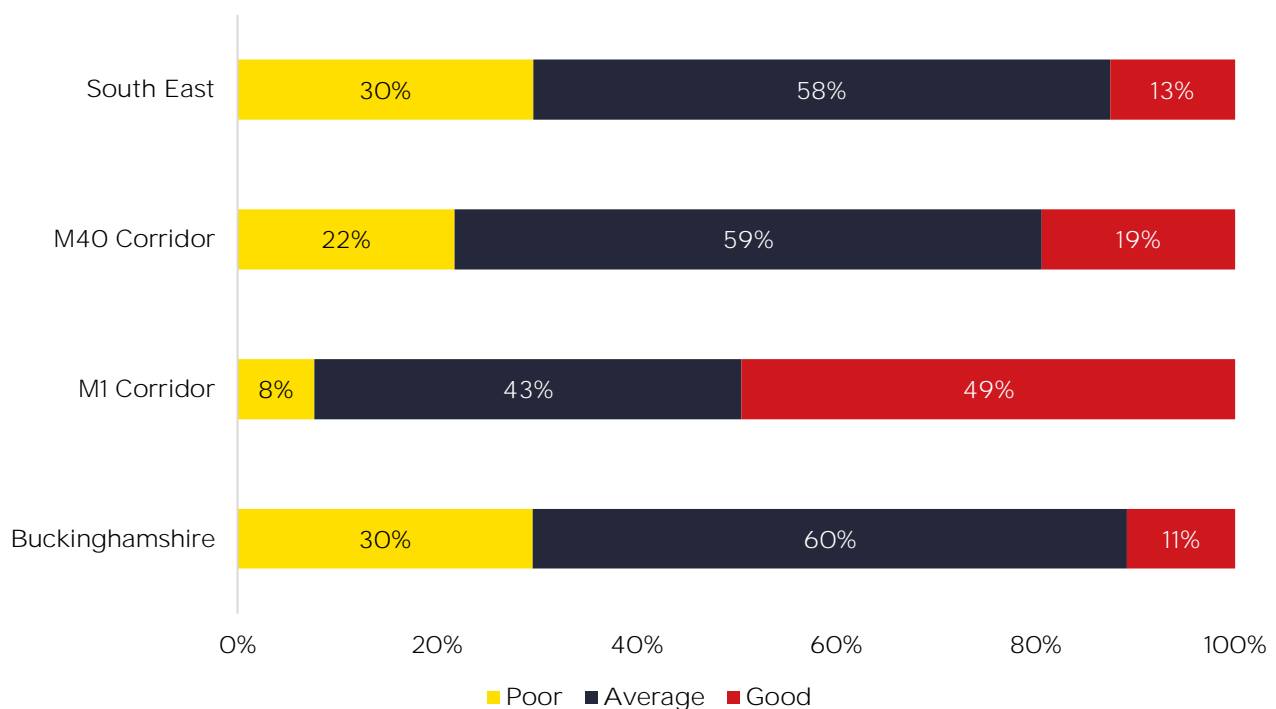
4.6.2 As a result, it comes as no surprise that occupiers are gravitating towards better quality buildings, with better Environmental, Social and Governance (ESG) features. As a result, demand is strongest for Grade A properties that achieve high BREEAM and EPC ratings.

Such properties are assigned a rating of 4 or 5 by CoStar. Properties that don't meet these standards are typically given either a 3 star rating which denotes average quality, or a 1 or 2 star rating indicating below average quality.

4.6.3 Figure 4.7 compares the quality of I&L stock by CoStar rating within Buckinghamshire, the M1 and M40 Corridors, and the South East more widely. It illustrates that Buckinghamshire in particular has a lower level of high quality I&L floorspace (just 11% of overall inventory), compared to the M1 Corridor and M40 Corridors (49% and 19% respectively). It also trails the South East (13%) proportion. Concurrently almost a third of Buckinghamshire's I&L inventory is considered to be of poor quality. The notably higher proportion of good quality I&L stock along the motorway corridors, particularly the M1 Corridor, likely reflects the recent wave of development in these areas, as newer schemes tend to be of higher quality.

4.6.4 The Proposed Development will help will to raise the overall quality of Buckinghamshire's I&L stock by delivering a series of units across a range of unit sizes. These units will be best in class premises with high ESG credentials.

Figure 4.7 Quality of I&L Stock within Buckinghamshire, M1 and M40 Corridors, and the South East



Source: CoStar, Savills 2025

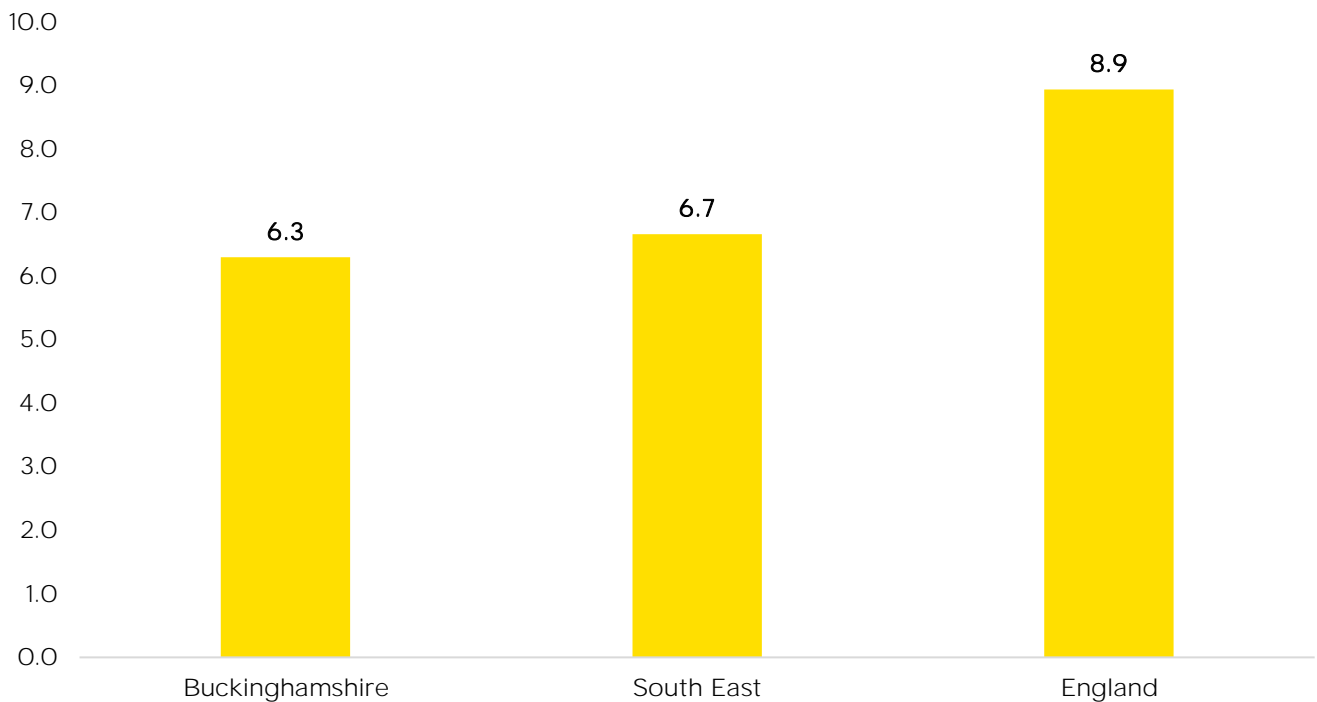
### 4.7 Buckinghamshire has a proportionally small I&L market

4.7.1 Figure 4.8 below shows how much I&L floorspace Buckinghamshire has per working age resident (16-64 years) compared to the South East and national average. In effect it shows how large the I&L sector is relative to the size of the local working age population.

4.7.2 Buckinghamshire has 6.3 sqm of I&L floorspace per working age resident (16-64 years). This is lower than the regional rate (6.7 sqm), and significantly below the England rate

which stands at 8.9 sqm. Given the strength of the I&L market, this relative lack of supply is restricting Buckinghamshire's participation in the sector's growth.

Figure 4.8 I&L Floorspace to Working-Age Population (16-64 Years) Ratio (2024)



Source: CoStar, ONS, Savills 2025

### 4.8 Leasing demand by sector

4.8.1 To better understand the nature of demand over the last decade (2015-2024), we look at lease transactions by sector since 2015. The top 5 sectors by floorspace leased have been Retail/Wholesale, Transportation and Warehousing, Manufacturing, and Professional, Scientific and Technical Services, across both Buckinghamshire and the M1/M40 Corridors. This analysis is illustrated in Figure 4.9 below.

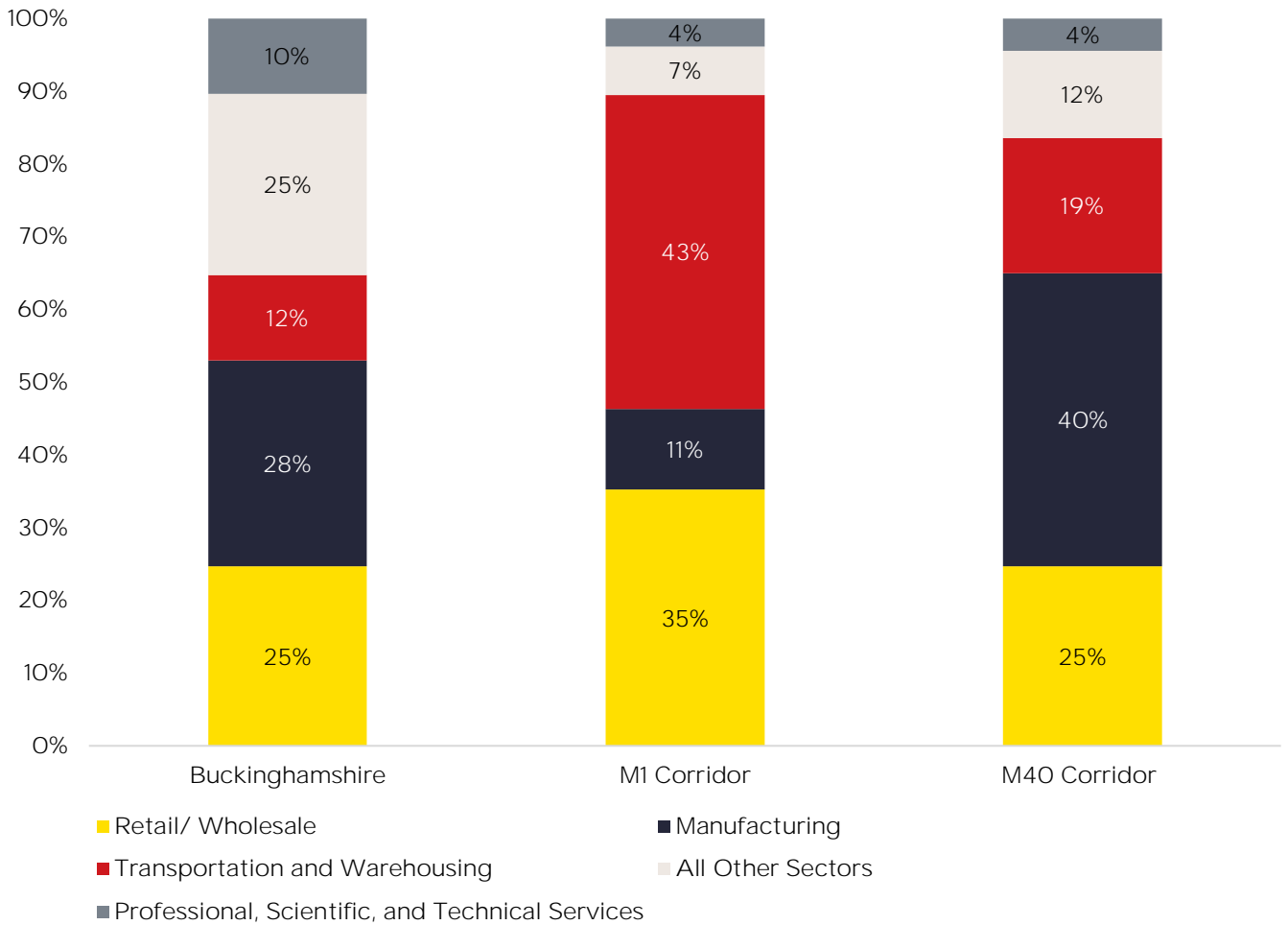
4.8.2 The sectors which are typically linked to e-commerce are Retail, Transportation and Warehousing, and Wholesale. Over the past decade (2015-2024), these sectors have accounted for 36% of leasing demand in Buckinghamshire, 78% in the M1 Corridor and 43% in the M40 Corridor. Given that they are both national significant movement corridors, it is no surprise that the M1 and M40 corridors have a higher proportion of e-commerce related occupiers when compared with Buckinghamshire.

4.8.3 While Buckinghamshire's share of e-commerce related occupiers is high, it also supports a more diverse occupier base than that in the M1 and M40 Corridors. For example a substantial proportion of leased floorspace within Buckinghamshire is occupied by the manufacturing sector, accounting for 28% of floorspace leased over the last decade, with a further 10% coming from occupiers in the professional services sector. This compares to 11% and 4% in the M1 Corridor. This reflects the presence of a strong and diversified economic base, with many occupiers less reliant on prime access to motorway junctions but in close proximity to major urban conurbations, end customers and suppliers.



4.8.4 From the perspective of the Applicant’s Proposed Development, this is a positive, as it suggests that the new units to come forward can serve a broad spectrum of downstream users and occupiers, rather than being dependent on a narrow occupier base.

Figure 4.9 Share of Floorspace Leased by Sector (2015-2024)



Source: CoStar, Savills 2025

## 5 Savills Future I&L Demand Estimate

### 5.1 Savills Suppressed Demand Methodology

- 5.1.1 The purpose of this section is to estimate future I&L demand in Buckinghamshire where the Subject Site is located. In order to do this we use the Savills Suppressed Demand Methodology.
- 5.1.2 The Savills Suppressed Demand method has been developed to provide a market signals based approach to assessing future economic land needs. This is different to the primarily historic trend based approaches referenced in the Planning Practice Guidance ('PPG'). These include the 'past completions' method, 'labour supply' method and labour demand method<sup>28</sup>. The latter of which (labour demand and labour supply) were adopted in the Council's employment evidence and Regulation 18 Plan (see Section 2).
- 5.1.3 It is important to note that the PPG does not provide explicit guidance on how these approaches should be applied, nor does it state that alternative methods are prohibited. This stands in clear contrast to the government's guidance on calculating housing need, which benefits from a single, clear, and consistent methodology.
- 5.1.4 As detailed in Appendix A, the Savills suppressed demand methodology takes a layered approach to estimating future I&L demand. This comprises calculating historic and suppressed demand (as measured by leasing demand called net absorption), and estimating the additional demand associated with E-commerce growth. The methodology also factors in significant sensitivity testing to ensure the demand estimates are robust.
- 5.1.5 While Savills considers that future I&L demand is most appropriately assessed at a wider sub-regional geography, rather than confined to individual local authority boundaries (see Section 2.2), for the purposes of this report, demand has been modelled solely at the Buckinghamshire level. This approach has been adopted to ensure that our analysis is directly comparable with the Council's evidence base, thereby enabling a consistent, like-for-like comparison.
- 5.1.6 The demand estimates presented in this report should therefore be interpreted within this context, recognising that they reflect the needs of Buckinghamshire in isolation and may not fully capture the cross-boundary functional market dynamics that influence I&L activity across the wider sub-region. In practice, occupier demand, labour catchments, and supply chains operate across administrative boundaries, meaning that a sub-regional demand assessment more accurately reflects real-world market behaviour.

### 5.2 The Savills Approach is NPPF/PPG Compliant

- 5.2.1 We consider the Savills Suppressed Demand method to be fully compliant with both the NPPF and PPG.
- 5.2.2 In terms of the NPPF, it is consistent with the requirements of Paragraph 32 in that it considers market signals such as net absorption and availability in order to estimate suppressed demand (i.e. demand lost due to historic supply constraints).
- 5.2.3 Savills Suppressed Demand method is also compliant with the section in the PPG 'how

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<sup>28</sup> Paragraph: 027 Reference ID: 2a-027-20190220

can market signals be used to forecast future need' which states:

*'Analysis based on the past take-up of employment land and property and/or future property market requirements'*. Paragraph: 027 Reference ID: 2a-027-2019022

5.2.4 Net absorption measures the past take up of 'property' as detailed in the above reference while the application of an E-commerce uplift is 'a future property requirement'.

5.2.5 Similarly, Paragraph 31 offers only high-level direction, including the consideration of market signals such as take-up rates and availability, economic forecasts, and engagement with relevant stakeholders. Specifically, Paragraph 031 states that assessments can be informed by:

- Engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size, and location of facilities, including the impact of new and emerging technologies;
- Analysis of market signals, including trends in take-up and the availability of logistics land and floorspace across the relevant market geographies;
- Analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and
- Engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies.

5.2.6 The Savills methodology aligns with at least two of the guidance points outlined above, as it:

- Analyses *'market signals, including trends in take-up and the availability of logistics land and floorspace across the relevant market geographies'*<sup>29</sup>. If a market is identified as being supply constrained (i.e. demand exceeds supply), the Savills model supplements the historic demand profile accounting for suppressed demand (i.e. demand lost due to historic supply constraints).
- Applies *'economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector'*<sup>30</sup>. The Savills method quantifies how much industrial floorspace growth is linked to current and future E-commerce growth, which is the main growth driver for the sector, driving both demand for the supply-chain, and also the manufacturing of goods.

5.2.7 The Savills methodology is therefore, in our view, NPPF/PPG compliant. It represents an innovative approach to understanding what true market demand for I&L uses may look like based on market signals.

5.3 Where the Savills approach has been considered

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<sup>29</sup> In accordance with PPG, Paragraph: 031 Reference ID: 2a-031-20190722

<sup>30</sup> Ibid

5.3.1 The Savills model is widely being regarded as industry best practice and has been considered on numerous different occasions, including by the Council's appointed economic advisers as discussed in Section 2.3.

5.3.2 We summarise below further occasions where the Savills model has been considered.

- Endorsed by the British Property Federation ('BPF') in the 'Levelling Up - The Logic of Logistics' report. The BPF Industrial Board, who commissioned the report, consists of many of the major investors and thought leaders in the I&L sector, including Newlands, Segro, Indurent, The United Kingdom Warehousing Association, IM Properties, GLP, Tritax Symmetry and the BPF itself.
- 'Levelling Up - The Logic of Logistics' report was shortlisted for an RTPI Award for Research Excellence 2022.
- 'Levelling Up - The Logic of Logistics' report was referenced as part of the previous Government's 'Future of Freight Plan.'
- Considered as one of the estimation methods in the Warehousing and Logistics in the South East Midlands Study (September 2022).
- Considered as part of the West Midlands Strategic Employment Sites Study (August 2024).
- Considered as part of the South West Hertfordshire Economic Study (2024).
- Supported the need case for the Hinckley National Rail Freight Interchange (HNRFI). While the SoS eventually rejected the overall proposals in March 2025, the need case for the development was accepted in a 'Minded to Refuse' letter dated 10th September 2024 from Gareth Leigh Head of the Transport and Works Act Orders Unit, Department for Transport.
- Supported the planning application and subsequent appeal for an I&L scheme in Theale, Berkshire. The appeal (APP/WO340/W/25/3360702) was allowed in July 2025. The Inspector's decision highlighted the planning benefits of making a much needed reduction in the current shortfall of I&L land, and the sizeable economic benefits associated with the scheme.
- Supported the need case for a planning application called Basingstoke Gateway, for 920,000 sq.ft of B8 floorspace with ancillary offices in Basingstoke and Deane Borough Council. The application was approved at Planning Committee in November 2024. (Planning Ref: 23/O3120/FUL in Basingstoke and Dean).
- Used to support numerous adopted and proposed site allocations in Local Plans, including South Staffordshire, Wigan, Bassetlaw and Crawley.

#### 5.4 Savills Suppressed Demand Estimates

5.4.1 Based on the Savills demand methodology, including an E-commerce uplift and accounting for suppressed demand, over a 21-year period consistent with the emerging Buckinghamshire Local Plan, we estimate Buckinghamshire's I&L demand to be between 230 ha - 241 ha of land.

5.4.2 The latter is our baseline demand estimate reflecting market signals over the last 13 years

(2012-2024), while the former is our lower bound estimate based on a series of pessimistic sensitivity tests.

- 5.4.3 Full details and step by step guidance on how these demand estimates have been generated are in Appendix A. The Proposed Development, covering approximately 46 ha (See Section 6), could meet between 19% and 20% of Buckinghamshire's future demand. This analysis is demonstrated in Table 5.1.

Table 5.1 Buckinghamshire I&L land demand over 21-year forecast

Land Demand Estimates (Ha)	
Buckinghamshire	230 - 241

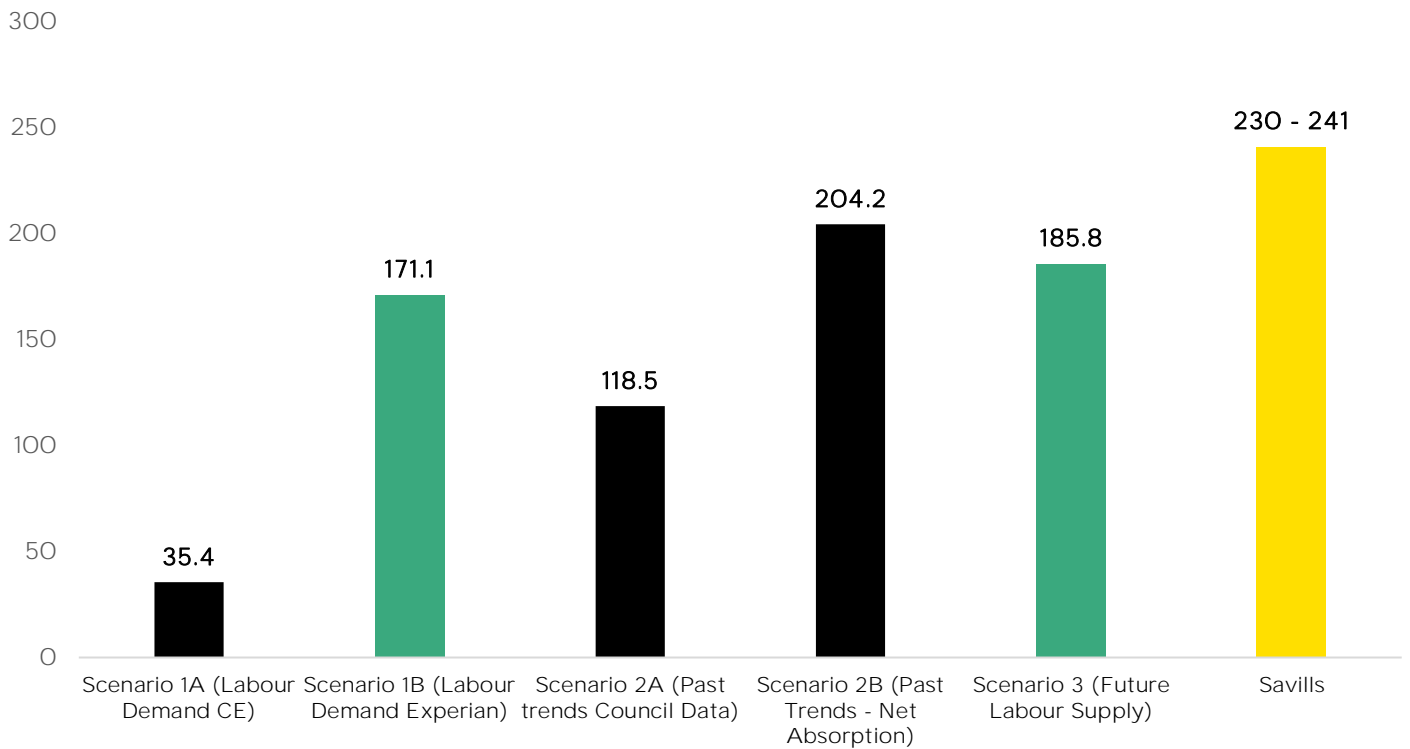
Source: Savills 2025

### 5.5 Comparing Savills Demand Estimates with Council's Employment Evidence

- 5.5.1 The EES (2025) estimates a gross I&L land requirement of between 35.4 ha (Scenario 1A) and 204.2 ha (Scenario 2B), with the EES concluding that the demand estimates under Scenario 1B (171.1 ha) should form the *minimum* employment space requirement that the Local Plan should seek to provide for across the local plan period.
- 5.5.2 Meanwhile, as stated in Section 2.2, the Regulation 18 Plan states on page 40 that the employment need for industrial and warehousing & distribution uses over the plan period is 185.8 ha. This figure appears to correspond to the demand figure projected under Scenario 3 from the EES.
- 5.5.3 Savills demand estimates range between 230 ha and 241 ha of I&L land over a 21-year period in Buckinghamshire, and are therefore higher than all five scenarios presented in the evidence base, and significantly above the minimum level catered for in the EES. This analysis is illustrated in Figure 5.1.



Figure 5.1 Savills Future I&L Land Demand Estimates versus the **Council's** Evidence Base (Ha)



Source: Savills, Buckinghamshire EES 2025

- 5.5.4 The analysis demonstrates that in Savills view the Council's employment evidence has underestimated demand for I&L land over the forecast period.
- 5.5.5 As discussed in Section 2, in our view the Council's most market facing methodology is Scenario 2B, which is based on the forward projection of net absorption. It is therefore unsurprising that this scenario is most aligned to our estimates, which are based on a market signals approach.

## 6 Subject Site's Suitability for I&L Development

### 6.1 Site Context

- 6.1.1 The Subject Site extends to approximately 46 hectares and is currently in agricultural (arable) use. It is situated immediately south of and directly adjacent to the A4146, which also forms the western boundary of the Site. To the south lies the village of Stoke Hammond, while to the east the Site is bounded by Stoke Road, beyond which lies further agricultural land.
- 6.1.2 Although the Subject Site falls within the administrative area of Buckinghamshire Council, it is located immediately adjacent to the boundary with the neighbouring local authority of Milton Keynes. The Milton Keynes Central Business District lies approximately 7 kilometres to the north of the Site and can be reached in around 18 minutes by car.
- 6.1.3 Figure 6.1 presents the red line boundary of the Subject Site in relation to the local authority boundary between Buckinghamshire and Milton Keynes.

Figure 6.1 The Subject Site



Source: Savills 2025

### 6.2 Strategic Advantages of the Subject Site

- 6.2.1 The Subject Site's location benefits from a number of strategic advantages which make it a prime location for I&L development. These include:

- Proximity to nationally significant movement corridors (M1 and M40);
- Convenient access to suppliers and end customers;
- Convenient access to a pool of potential workers (labour supply); and
- Convenient access to major freight handling infrastructure that can be utilised as part of I&L companies' wider supply chains.

6.2.2 It should also be noted that the Site is under the control of a specialist land promoter (Richborough Commercial) with the flexibility to promote the land to meet demand for a range of employment uses. This is discussed further in Section 6.3.

6.2.3 The Subject Site will generate a considerable level of new job opportunities for local residents to help increase self-containment levels (i.e. the number of people who live and work in Buckinghamshire). Buckinghamshire has a self-containment rate of 39%, below the rate for the South East region (47%)<sup>31</sup>.

6.2.4 This means that 61% of Buckinghamshire's in-work residents travel outside of the area for work. Consequently, Buckinghamshire is losing the economic output from a sizeable portion of its workforce, and not capturing the sustainability benefits associated with residents travelling less distance to their places of work. The best way to improve self-containment is to promote local job growth which the Proposed Development can assist with. The inclusion of smaller and mid-box units will help meet local and indigenous demand, while the larger units are expected to attract investment from outside the area (see Section 6.3). The new job opportunities created will also improve the employment prospects of deprived communities in the vicinity of the Subject Site, as discussed in Section 3.

6.2.5 We consider the Subject Site's locational characteristics in more detail below.

### *Strategic location with proximity to nationally significant M1 and M40 corridors*

6.2.6 Given its foundational role in the storage and transportation of goods, location is critically important for I&L occupiers as it impacts the efficiency and viability of operations. Sites in close proximity to major urban conurbations and freight handling infrastructure, such as major motorway corridors and strategic rail freight terminals, are considered prime locations for I&L development. These locations allow:

- Quicker access to a large pool of end customers, both for delivering directly to households and businesses, or to other manufacturing firms further down the supply chain;
- Access to a large labour pool, providing I&L occupiers access to workers in order to fill the roles within the sector, which as discussed in Section 3 above, are becoming increasingly higher skilled; and
- Reduced financial costs and environmental impacts due to shorter distances travelled. The latter is particularly important in light of the Government's climate change targets

6.2.7 The importance of location is further evidenced in Savills European Logistics Census, where 96% of respondents cited building location as 'important' or 'very important' when

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<sup>31</sup> ONS Census 2011. Location of Usual Residence and Place of Work

deploying new capital<sup>32</sup>.

6.2.8 As shown in Figure 6.2 below, the Subject Site lies directly adjacent to the A4146. While the segment of the A4146 the Subject Site sits adjacent to it is not considered to be part of the Strategic Road Network (SRN), as defined by the Department for Transport, it remains an important north-south link road. It facilitates transport into Milton Keynes, and links directly to Junction 14 of the M1 via a 15-minute drive. The M1 is a major north-south corridor connecting London to Yorkshire and supporting freight movement across England. In addition, the M40 motorway lies within reasonable proximity to the west of the Site. The M40 provides another strategically significant transport corridor, connecting London and Birmingham and offering an alternative freight route to the M1.

6.2.9 Both the M1 and M40 are nationally significant movement corridors that facilitate over 10,000 HGV and LGV movements per day. The Subject Site's proximity to these roads offers clear advantages for I&L occupiers, including reduced transportation times, lower operating costs, and associated carbon savings.

Figure 6.2 Nationally significant roads in relation to the Subject Site



Source: DfT, Savills 2025

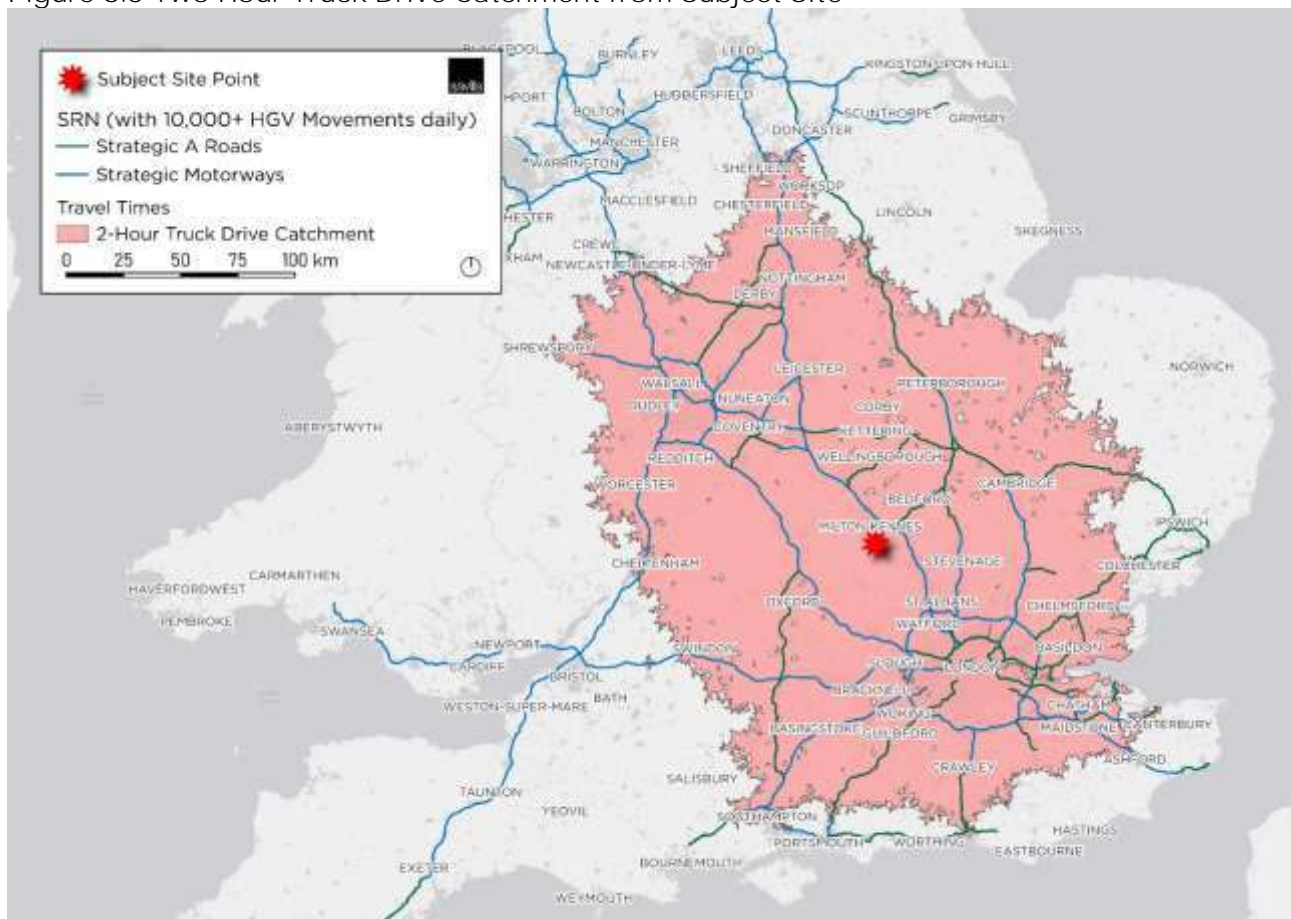
### High Accessibility to Suppliers and End Customers

<sup>32</sup> Savills European Logistics Census (2023) is a survey of over 400 occupiers, developers, investors, landowners, asset managers, agents, and advisors involved in the I&L sector. Its aim is to understand opportunities and challenges facing the sector. Available at: [https://www.savills.co.uk/research\\_articles/229130/351442-0](https://www.savills.co.uk/research_articles/229130/351442-0)

6.2.10 Most I&L occupiers have supply chains linking themselves with their suppliers and end customers of between 1 to 4 hours travel time. The shorter travel time is more typical of local and regional companies, while longer travel times are more typical of larger companies that do business throughout the country. This is a point we have clarified with Savills Industrial Agents, with further evidence to support this assumption provided in Section 2.2.

6.2.11 If we take the middle ground of 2 hours, which is appropriate for most companies, approximately 30.5 million people (approximately 51% of England and Wales’s population), and approximately 1.4 million businesses (approximately 57% of England and Wales’s total businesses) can be accessed from the Subject Site. Such high numbers are because large conurbations including London, Birmingham, Milton Keynes, Reading, Oxford, Cambridge amongst others, are all accessible from the Subject Site within 2 hours. This analysis is illustrated in Figure 6.3.

Figure 6.3 Two Hour Truck Drive Catchment from Subject Site



Source: Savills 2025

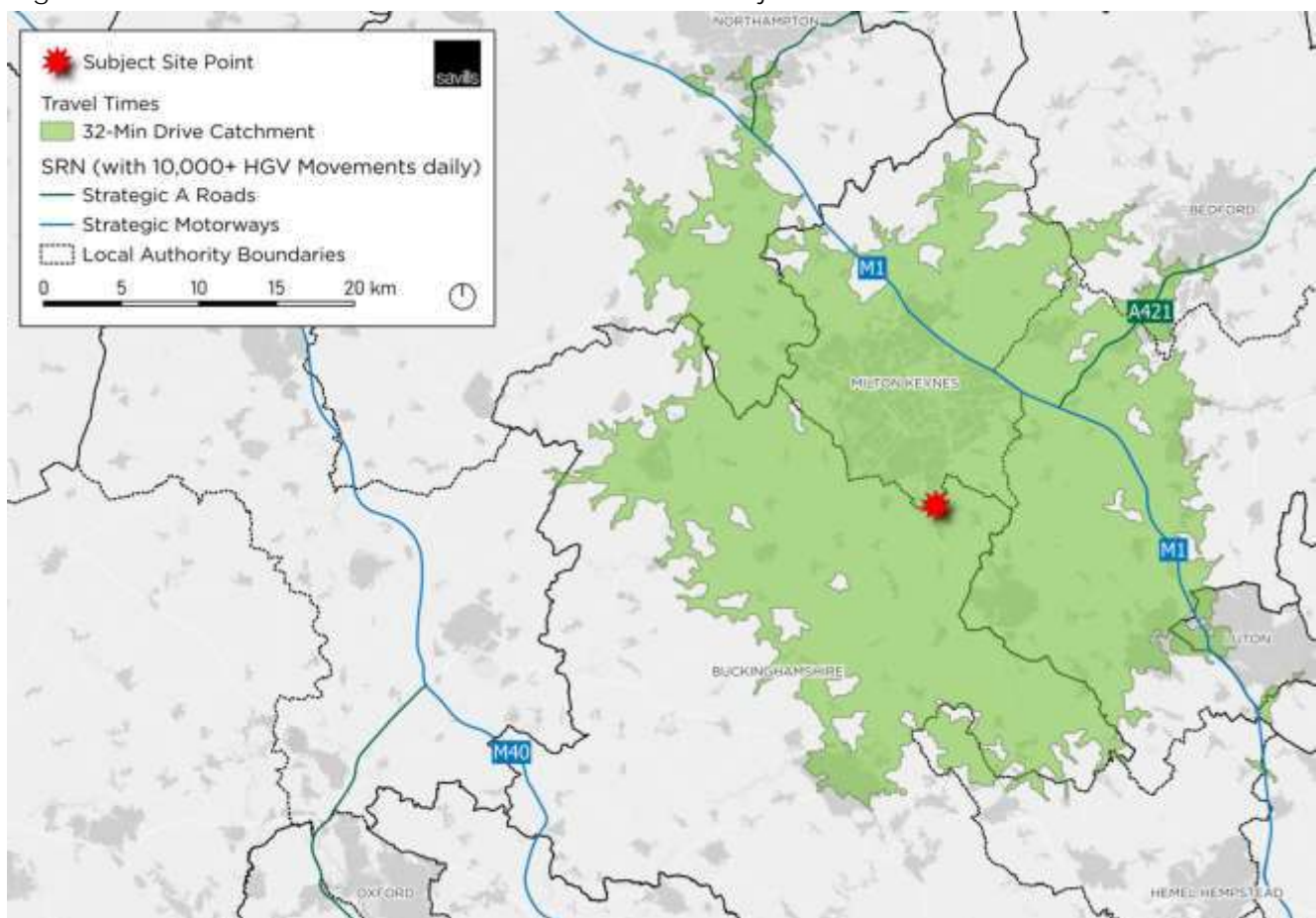
### High Accessibility to a Large Labour Pool

6.2.12 One of the strongest parts of the UK economy currently is the low unemployment rate, which currently stands at 4.7% (July 2025). The flip side of this is that the availability of labour for UK companies has become increasingly challenging. As a result, labour availability has shot up the list of factors impacting I&L occupiers, with 25% of occupiers

stating it as one of their biggest challenges in Savills European Logistics Census<sup>33</sup>.

6.2.13 We consider a 32-minute drive catchment to be appropriate for assessing labour from the Subject Site. This is the average home-to-work travel time for Buckinghamshire<sup>34</sup>. Within this catchment approximately 436,460 working age-people (aged 16-64) are reachable, representing a high level of workforce accessibility and a considerable labour pool for future businesses located at the Subject Site to draw from. In addition to this, some people would be willing to travel further than the average drive to work time, or may use other methods of transport such as public transport. This means that the potential workforce available to future occupiers at the Subject Site may be higher than this 436,460 figure.

Figure 6.4 32-minute car drive time catchment from Subject Site



Source: Savills 2025

### Ability to Link with Major Freight Handling Infrastructure

6.2.14 Savills has advised on numerous major freight handling projects across England in recent times. These include East Midlands Gateway, West Midlands Interchange ('WMI'), DIRFT, Humber Ports, Ellesmere Port, Southampton Airport, and Heathrow Airport, among others.

6.2.15 These projects have taught us that it's not only I&L premises located directly adjacent to

<sup>33</sup> <https://pdf.euro.savills.co.uk/uk/commercial---other/spotlight---european-logistics-census-2024.pdf>

<sup>34</sup> ONS User Request Data - 2018: TRVTIME Usual home to work travel time (minutes) by local authority

freight handling infrastructure (i.e. airports, ports, and rail freight interchanges) that benefit from this infrastructure. For instance, a study<sup>35</sup> of the operations of DIRFT I and II analysed the destination of outbound lorries leaving the rail terminal. It found that only 27% of all outbound lorries were destined to locations within the DIRFT estate. This means that the remaining 73% of lorries were moving goods further afield to destinations that were not within the immediate surroundings of the local estate. This analysis is useful as it clearly indicates that I&L developments not directly linked or within the estate of key freight handling infrastructure, but located relatively nearby, can benefit from its use as part of their wider supply chains.

6.2.16 Again we consider a 2-hour truck-time catchment as suitable in capturing the majority of I&L businesses that may use freight handling infrastructure as part of their supply chains. We also map a 45 minutes' truck time catchment given that, based on previous work, this is what operators of rail freight interchanges consider their primary catchment area for businesses using their facilities.

6.2.17 Table 6.1 below lists the various freight handling infrastructure within a 45 minute and 2 hour truck time catchment of the Subject Site, while Figure 6.5 below shows the geographic coverage of these catchments. The Subject Site is within 2 hours of several rail freight interchanges, freight airports and ports. This means that the Subject is a prime location for occupiers who wish to decarbonise their supply chains via the use of rail and/or those occupiers who handle high value and rapid deliveries via air freight.

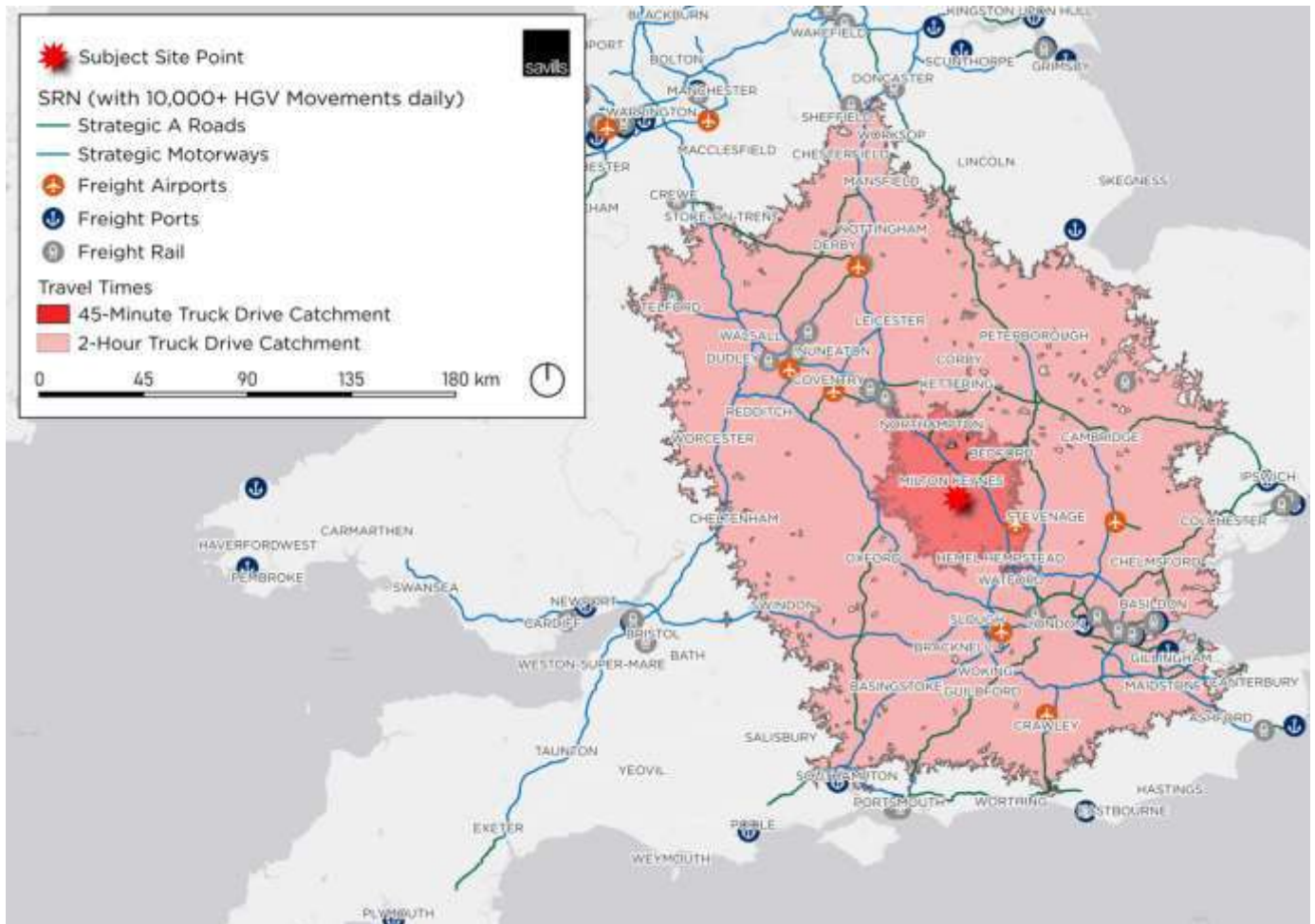
Table 6.1 Freight Infrastructure within a 45-Minute and 2-Hour Truck Time Catchment

	45-Minute Truck Time Catchment	Between a 45-Minute and a 2-Hour Truck Time Catchment
Rail Freight Interchanges	DIRFT	Barking, Birch Coppice, East Midlands Gateway, Ely, Hams Hall, Lawley Street, London Gateway, Purfleet, Telford (TIRFP), Tilbury, Rotherham, Rugby, Wembley (EFOC)
Freight Airports	London Luton	Birmingham, Coventry, East Midlands, Gatwick, London Heathrow, Stanstead
Ports	N/A	Chatham, London, London Gateway, Tilbury, Southampton

Source: Savills 2025

<sup>35</sup> Nathaniel Lichfield & Associates (2012), DIRFT III: Planning For The Future – The Expansion Of Daventry International Rail Freight Interchange – cited in Roxhill (2019), Document 6.8 – Market Analysis Report – Northampton Gateway Strategic Rail Freight Interchange

Figure 6.5 Freight Infrastructure within a 45-Minute and 2-Hour Truck Time Catchment of the Subject Site



Source: Savills 2025

### 6.3 The Proposed Development

6.3.1 The Proposed Development is anticipated to respond directly to prevailing market signals by prioritising the delivery of a range of large-scale I&L units, above the 9,300 sqm (100,00 sq.ft) threshold. As demonstrated in Section 4, the current availability of such units in Buckinghamshire is exceptionally low (2.8% based on 2025 YTD), and over the past decade, availability has fallen to zero on a number of occasions (for example 2023-2024) (Figure 4.3). This persistent undersupply has meant that, when large units do become available, they are typically absorbed rapidly by the market.

6.3.2 This pattern highlights the strength of demand for large-scale units and underlines the structural shortage within the local market. Such demand is consistent with broader market dynamics, where larger units tend to exhibit stronger viability, generate higher land values, and in turn can support the funding and delivery of associated infrastructure. Against this backdrop, the Proposed Development presents a significant opportunity to address a clear gap in the market, enhancing Buckinghamshire's competitiveness in attracting and retaining strategic occupiers and drawing investment from neighbouring areas such as Milton Keynes (see Section 7).

- 6.3.3 Although the central focus of the Proposed Development will be on delivering strategic large format units, the Subject Site also possesses the flexibility to accommodate a complementary range of smaller<sup>36</sup> and mid-box units<sup>37</sup>. This will enable the scheme to cater to a diverse occupier profile, from major PLCs and national operators through to regional businesses and locally, indigenous based firms seeking modern, high-quality space. The inclusion of mid-box units in particular will provide space for smaller firms in the local area to scale up their activities. The ability to deliver a balanced mix of unit sizes will enhance resilience, broaden the scheme's market appeal, and help to create a varied employment base on site.
- 6.3.4 At this stage, there remains flexibility in the configuration of the Proposed Development. For the purpose of the Assessment, the Applicant has prepared an illustrative concept masterplan, which sets out one way the Proposed Development could come forward. This is presented in Figure 6.6, and comprises the delivery of range of unit sizes across small, mid-box and large units.

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<sup>36</sup> Defined as units between 0-2,800 sqm / 30,000 sq.ft

<sup>37</sup> Defined as units between 2,800 sqm – 9,300 sqm / 30,000 sqft – 100,000 sq.ft.

Figure 6.6 Illustrative Concept Masterplan



Source: Richborough 2025

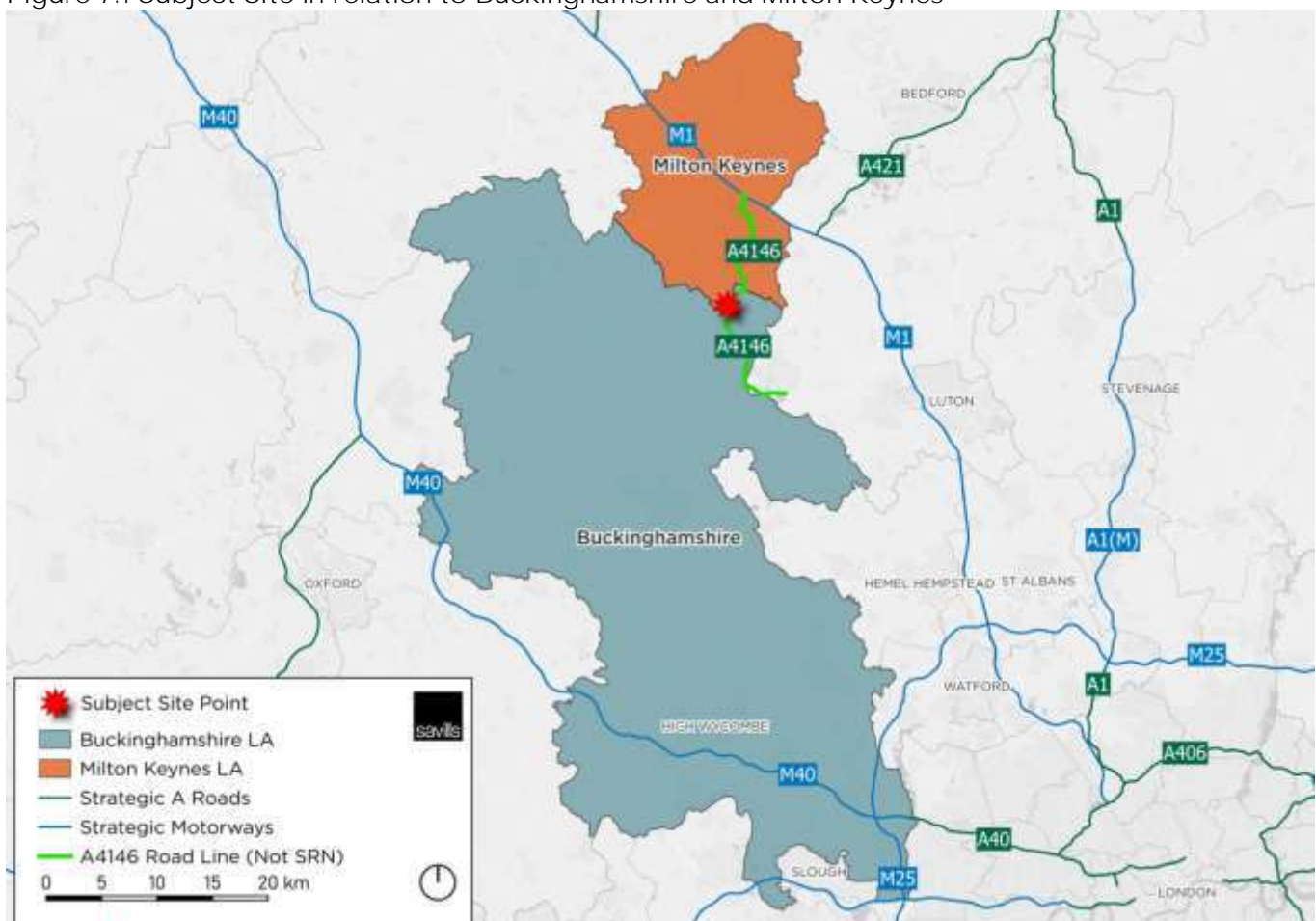
## 7 Cross-border opportunities with Milton Keynes

### 7.1 Introduction

7.1.1 As noted in Section 6, the Subject Site is located on the border with the adjacent local authority of Milton Keynes. As such, the underlying market dynamics in Milton Keynes also exert a material influence on the Site and its development potential. This section examines the cross-boundary opportunities between Buckinghamshire and Milton Keynes, highlighting how the delivery of the Applicant's Proposed Development at the Subject Site can contribute to meeting identified needs and objectives across both local authority areas.

7.1.2 Figure 7.1 illustrates the location of the Subject Site in relation to Buckinghamshire and Milton Keynes.

Figure 7.1 Subject Site in relation to Buckinghamshire and Milton Keynes



Source: Savills 2025

### 7.2 Milton Keynes is unable to meet its I&L employment land needs

7.2.1 Milton Keynes, like Buckinghamshire, is currently in the process of developing a new Local Plan. The MK City Plan (MKCP 2050) will provide a long-term planning framework to

guide where and how new homes, jobs, infrastructure, and community facilities will be delivered across Milton Keynes across the period 2022-2050. It aims to ensure sustainable growth that supports a thriving economy, protects the environment, and enhances quality of life for residents.

7.2.2 Following the Regulation 18 consultation on the Draft MKCP 2050, which took place between July and October 2024, Milton Keynes City Council (MKCC) has been finalising the evidence base to inform the next stage of the Plan. The Council intends to undertake consultation on the final draft MKCP 2050 between November and December 2025, with formal submission for independent examination anticipated in March 2026.

7.2.3 Throughout the Regulation 18 consultation documents and supporting evidence, MKCC has consistently acknowledged the strategic importance of the I&L sector to the local economy. However, the Council has also recognised a growing constraint on the availability of suitable land, which risks limiting the sector's capacity for continued growth. These dynamics are clearly reflected in a number of key policy and evidence base documents, including:

- Draft Regulation 18 MKCP 2050 Plan – paragraph 31: *'The logistics industry has exhibited strong growth in recent years, with many large warehouses constructed within the city. In 2022, it employed 17,000 workers, 9.4% of all jobs in Milton Keynes, significantly higher than the Great Britain average of 5%, indicating the Milton Keynes has been a good location for this sector due to the M1 corridor and close to large markets in London and Birmingham. While demand in this sector remains strong, opportunities for further growth in Milton Keynes are diminishing due to the lack of suitable land to accommodate the specific needs of this sector'*.
- Milton Keynes Housing and Economic Development Needs Assessment (2023) – paragraph 19: *'Milton Keynes has become an increasingly strong industrial and warehousing location, and is now home to many leading occupiers base on excellent transport links, abundance of speculative development and highly skilled workforce. In contrast to the office market, the Covid-19 pandemic created a 'race for space' with record levels of demand for industrial and particularly warehousing space. This has pushed up rents by approximately 15%. The strength of demand has put pressure on supply with an acute shortage of units at present'*.
- Milton Keynes Economic and Cultural Prosperity Topic Paper (2024) – paragraph 2.6: *'Milton Keynes is a popular location for warehousing and logistics reflecting its excellent location, transport access to the M1 corridor and availability of large-scale sites to accommodate warehousing. However, in the future opportunities for the further growth of warehousing in Milton Keynes are diminishing due to the lack of suitable land to accommodate the specific needs of this sector'*.
- Milton Keynes Strategy for 2050 (2020) – page 67: *'Beyond our city boundary are other sensible locations for long term growth' and 'Proposals in areas beyond the Milton Keynes boundary are outside the remit of this Strategy but we hope to work closely with our neighbouring councils to develop joint proposals for growth that reflect the economic, social and physical links across our formal boundaries'*.

*Savills emphasis in bold.*

- 7.2.4 The findings set out above are underpinned by the Milton Keynes Housing and Economic Development Needs Assessment (HEDNA, 2023), prepared by Hardisty Jones Associates and Opinion Research Services. The HEDNA provides a comprehensive assessment of the city's housing and employment land requirements over the plan period 2022–2050.
- 7.2.5 Drawing upon a range of labour demand forecasts (detailed in Chapter 9 of the HEDNA), the study estimates a total requirement of between 420 and 580 ha of I&L land over the plan period. Approximately 80% of this total is expected to comprise warehousing (B8) uses, with the remaining 20% attributed to general industrial (B2) uses.
- 7.2.6 Taking into account land already identified for development and new employment allocations totalling 275.5 hectares, the residual requirement identified in the Regulation 18 Plan equates to a further 144.5–304.5 ha of I&L land to meet projected needs over the plan period (2022-2050).
- 7.2.7 This represents a substantial need in an already constrained market. Notably, the Milton Keynes Economic and Cultural Prosperity Topic Paper (2024), which is part of the Evidence Base for the Draft 18 Plan, concludes at paragraph 8.2 that:
- 'Milton Keynes is unable to accommodate forecasted needs for industrial and, particularly, warehousing floorspace over the plan period'.*
- 7.2.8 While a portion of future demand may be addressed through the redevelopment or intensification of existing commercial sites, analysis of historic MKCC monitoring data (2012–2022) by the HEDNA consultants indicates that only 33% of gross general industrial floorspace and 15% of warehousing and logistics floorspace were delivered on land previously in employment use. This demonstrates a limited capacity for re-use or redevelopment to meet the scale of forecast demand.
- 7.2.9 To address this challenge, the Topic Paper outlines several potential strategies, including ongoing engagement through the Duty to Co-operate process and formal requests to neighbouring local authorities to accommodate a share of Milton Keynes' unmet employment land needs.
- 7.2.10 The latter presents a clear and strategic opportunity for the Applicant's Site to contribute to meeting this identified shortfall and to support the wider economic growth objectives of the MK City Plan 2050.

## 8 Conclusions and Recommendations

8.1.1 The key findings of this report are summarised as follows:

- The latest employment evidence covering the scale of employment land needed in Buckinghamshire is the Buckinghamshire Employment and Retail Evidence – Part A Employment Evidence Study (EES), published by Lichfields in July 2025. The study provides an evidence base on the future needs for employment land and floorspace across the emerging plan period (2024-2045).
- The EES considers five employment need scenarios, based on three different estimation methods (labour demand/past development rates/labour supply). It concludes that 171 ha should be the minimum level of industrial floorspace that the Local Plan should seek to provide for to 2045. This is based on a labour demand model, provided by Experian.
- The Regulation 18 Local Plan has adopted a demand figure which appears to correspond to Scenario 3 of the EES (labour supply model), stating an employment need of 185.8 ha over the plan period.
- While both compliant with the PPG, it is Savills view that labour demand and labour supply models consistently underestimate true market demand for I&L land, as they are not grounded in market signals.
- This is important given our market assessment has demonstrated that the I&L sector's potential in Buckinghamshire is being inhibited by a lack of supply. The market has been supply constrained for the whole of the last decade with I&L availability below the 8% equilibrium level where a market is broadly considered to be in balance. Other market indicators corroborating this fact include strong rental growth, and demand (net absorption) exceeding supply (net deliveries) over the 2012-2024 period. Our market analysis is consistent with many of the findings within the Council's Modern Economic Study (2025), which is supporting evidence to the emerging Local Plan.
- Pertinently, availability for large scale units over 9,300 sqm, which have been driving demand in the market in recent years, is particularly low in Buckinghamshire.
- The use of a labour demand or labour supply model to estimate future land needs would only exacerbate the supply constrained nature of the market.
- Given the limitations of the demand methodologies used in the EES, Savills considers an alternative, market-led approach to assessing future I&L demand should be considered. Such an approach should place greater emphasis on market signals, as set out in Paragraph 32 of the NPPF, to ensure the full scale of future need is properly captured.
- Savills has developed a tried and tested methodology which takes a market signals approach, and which is NPPF/PPG compliant. It represents an innovative approach to forecasting land requirements and is considered to be industry best practice.
- Based on the Savills Suppressed Demand methodology, we estimate that demand for I&L land over a 21-year period in Buckinghamshire, consistent with the time frame in the Buckinghamshire emerging Local Plan, is between 230 - 241 ha.

- Our demand estimates are higher than all five scenarios presented in the EES, and significantly above the minimum level catered for in the EES (171 ha), and that adopted in the Regulation 18 Plan (185.8 ha). **In Savills view the Council's employment evidence** has underestimated demand for I&L land over the forecast period.
- The Applicant's Proposed Development at the Subject Site represents a prime opportunity to help to meet this significant demand. Its location, in between two major movement corridors (the M1 and M40), enables it to access a significant consumer, supplier and labour base.
- Importantly, the Subject Site's location on the border with the adjacent local authority of Milton Keynes positions it strategically to help meet Milton Keynes' identified I&L land needs too.
- Milton Keynes Council has acknowledged that it is unable to accommodate its forecasted I&L land requirements within its own administrative boundary over the emerging plan period. To address this, the Council has indicated that one potential strategy is to formally request neighbouring local authorities to accommodate a proportion of its unmet employment land needs. This approach presents a clear and strategic opportunity for the Applicant's Site.
- The Proposed Development at the Subject Site is anticipated to respond directly to prevailing market signals by prioritising the delivery of a range of large-scale I&L units, above the 9,300 sqm (100,00 sq.ft) threshold.
- The Subject Site also possesses the flexibility to accommodate a complementary range of smaller and mid-box units. This will enable the scheme to cater to a diverse occupier profile, from major PLCs and national operators through to regional businesses and indigenous/locally based firms seeking modern, high-quality space. This will enhance resilience, broaden the scheme's market appeal, and help to create a varied employment base on site.
- It is important that the I&L sector's growth is facilitated in Buckinghamshire through the delivery of the Applicant's proposals, given it has been the fastest growing sector of the economy over the last decade, a trend which shows no signs of abating. It provides better paid jobs compared to the national average across a diverse range of professions, and provides accessible employment opportunities to those who are currently unemployed or who have lower levels of skills attainment.
- **Taken together, it is Savills' view that there is significant demand for additional I&L land in Buckinghamshire, which should be addressed through the emerging Local Plan.** The Subject Site represents a prime opportunity to meet this demand and should therefore be allocated for employment use in the new Plan.

Mark Powney

Martyn Jenkins

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## 9 Appendix A – Savills Demand Calculations

### 9.1 Introduction

9.1.1 We present below Savills full methodology for estimating future I&L demand. The Savills methodology addresses the issues we raised against the Council's employment methodologies in Section 2.

#### *Compliance with National Policy and Guidance*

9.1.2 As discussed in Section 5.2 the Savills methodology is compliant with the requirements of the Planning Practice Guidance (PPG) as it:

- Analyses *'market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies'*<sup>38</sup>. If a market is identified as being supply constrained (i.e. demand exceeds supply) such as in Buckinghamshire's I&L markets (see Section 4), the Savills model supplements the historic demand profile accounting for suppressed demand (i.e. demand lost due to historic supply constraints).
- Applies *'economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector'*<sup>39</sup>. The Savills method quantifies how much I&L floorspace growth is linked to current and future e-commerce growth which is the major growth driver for the sector, driving both demand for the supply-chain, and also the manufacturing of goods.

9.1.3 Based on the above, we consider the Savills approach to estimating future I&L demand to be NPPF/NPPG compliant, and industry best practice. It has been endorsed by the British Property Federation ('BPF') in the *'Levelling Up – Logic of Logistics'* report, and was also shortlisted for an RTPI Award for Research Excellence 2022. The report has also been referenced as part of the Government's recently published 'Future of Freight Plan', and has been the focus of several discussions with senior officers at DLUHC and DfT. Our approach has also been recently considered in the Warehousing and Logistics in the South East Midlands Study. It is also being considered as one of the estimation methods as part of the West Midlands Strategic Employment Sites Study ('WMSESS'). Full details of where the methodology has been applied is available in Section 5.3.

9.1.4 Having regard to market signals and facilitating growth in the I&L sector are key priorities of the NPPF, namely:

- Paragraph 32 which states: 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'.

<sup>38</sup> In accordance with PPG, Paragraph: 031 Reference ID: 2a-031-20190722

<sup>39</sup> Ibid

- Paragraph 85 which states: 'Planning policies and decisions should help to create the conditions in which businesses can invest, expand, and adapt...The approach taken should allow each area to build on its strengths, counter any weaknesses, and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential'.
- Paragraph 87 which states: 'Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations'.

(Savills emphasis in bold).

## 9.2 Methodology

### *Step by Step Guidance*

9.2.1 The detailed steps we follow in estimating future I&L demand are outlined below.

- Step 1 – Calculate Buckinghamshire's historic and suppressed demand only: Firstly we consider future demand arising in Buckinghamshire based on the forward projection of net absorption. This step also accounts for 'suppressed demand' or demand lost historically due to supply constraints.
- Step 2 – Estimate additional demand associated with E-commerce growth: Secondly we consider increases in demand associated with future e-commerce growth which is the major growth driver for the sector, driving both demand for the supply-chain, and also the manufacturing of goods.
- Step 3 – We then translate the floorspace figures into a land requirement using an appropriate plot ratio. This forms our baseline demand estimate for future I&L demand in Buckinghamshire.
- Step 4 - To ensure our modelling process is robust, we carry out a series of sensitivity tests to understand what will happen to future I&L demand in Buckinghamshire should future demand weaken below historic trends. These sensitivity tests form our lower bound estimate for I&L demand in Buckinghamshire over the plan period.

- 9.2.2 We consider the full market for I&L units, estimating demand for all unit sizes and relevant planning use classes covering light industrial, manufacturing and warehousing. This is considered a more robust approach as it relies on a larger pool of data, and the fact light industrial, manufacturing, and warehouse occupiers desire similar types of premises with similar locational characteristics.

### Step 1 – Historic and Suppressed Demand

- Step 1 builds upon historic take-up (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand' which is added to the historic demand trend as a top-up.
- We estimate the Buckinghamshire's I&L demand (historic + suppressed) to be **776,394 sqm** of floorspace over a 21-year period.
- The steps are detailed below.

#### *Step 1A: Estimating Demand over the Local Plan Period*

- 9.2.3 We assume a 21-year period which is consistent with the time period used for the emerging Buckinghamshire Local Plan (2024-2045) and its supporting employment evidence (the 2025 EES).

#### *Step 1B: Estimation of Historic Demand*

- 9.2.4 This is based on the average annualised net absorption in Buckinghamshire for the overall I&L market between 2012 and 2024. This figure equates to 27,234 sqm. Savills considers net absorption to be the leading measure of demand for floorspace as it indicates the quantum of net floorspace occupied over a period of time (i.e. move-ins minus move-outs) based on lease deals. We provide further details behind the use of net absorption as a demand indicator in Section 2.2.

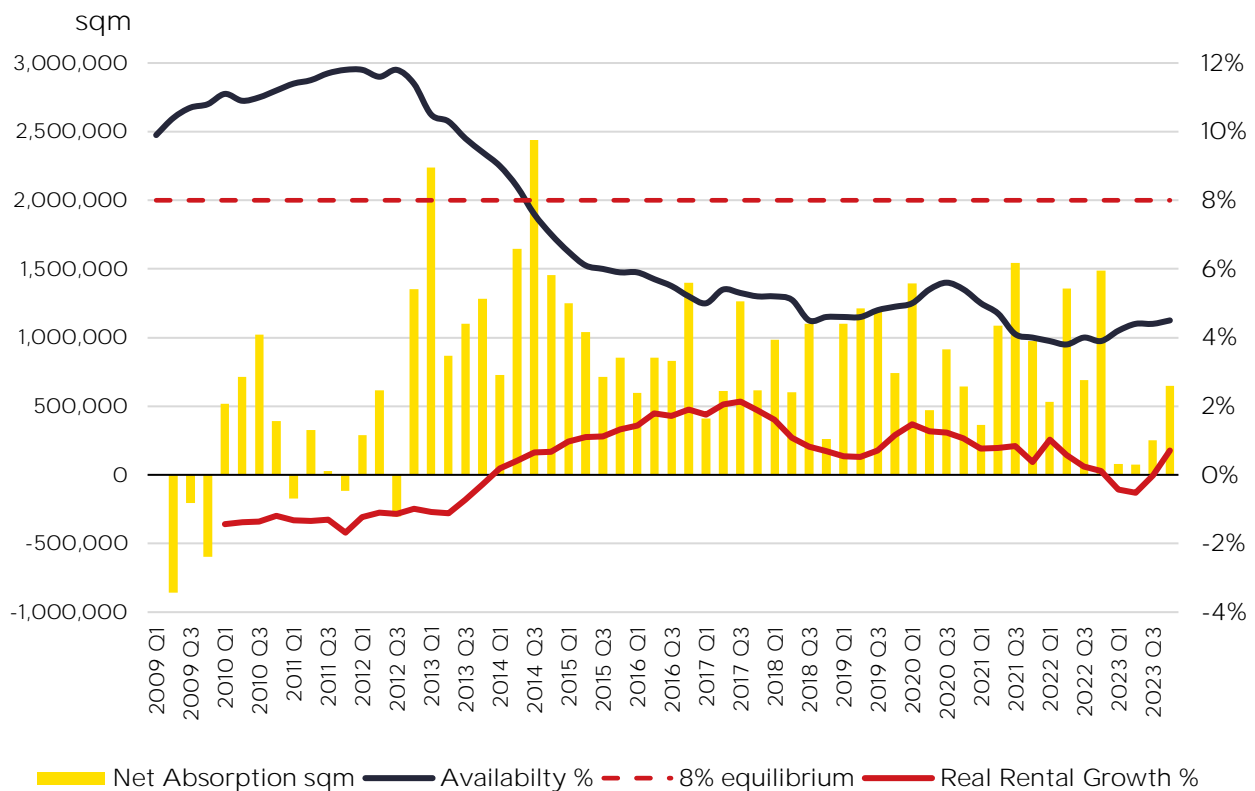
#### *Step 1C: Estimation of Suppressed Demand*

- 9.2.5 The rationale for accounting for suppressed demand is that when sufficient supply isn't available, demand cannot be accommodated. The top-up figure is added to the historic demand (net absorption) trend to account for years when the market was supply constrained.
- 9.2.6 Supply and demand are inextricably linked across all commercial property sectors. Put simply if demand exceeds supply, rents typically rise more quickly as occupiers compete for limited available stock. This can have a number of wider implications. For example, new companies aren't able to move into a market area, nor are existing companies able to find new space if their floorspace needs change, for instance, due to expansion. It may also happen that some existing local companies get priced out of the market as they can't afford the increasing rents. As a result, companies have to locate to areas that are not ideal in terms of serving their customer base, thereby increasing travel times and the cost

of doing business, not to mention environmental impacts. The lack of supply may also mean companies are forced to occupy space that is not entirely suitable for their operational needs impacting productivity.

- 9.2.7 We describe a market where supply doesn't keep up with demand as being 'supply-constrained'. Limited supply in a strongly performing market, such as Buckinghamshire's I&L market, means that demand cannot be fully satisfied, typically resulting in strong rental growth. These trends were clearly evidenced in Figures 4.2 – 4.6 earlier in this report.
- 9.2.8 At the national level the market equilibrium level, where supply and demand are broadly in balance and rents are more stable, is around 8.0% availability. This benchmark rate is found in a number of prominent publications such as the GLA's Land for Industry and Transport Supplementary Planning Guidance ('SPG'), and the British Property Federation's '*Levelling Up – The Logic of Logistics*' report.
- 9.2.9 If one studies real rental growth (i.e. rental growth adjusted for inflation) over the past decade at the national level and observes its relationship to availability, it becomes clear that I&L rents begin to grow strongly when availability is below 8.0%. This relationship is clearly illustrated in Figure 9.1 below. When availability was above 8.0% between 2009 and 2014, real rental growth (net of inflation) was either negative or only slightly positive. This enabled demand to be accommodated as sufficient supply was available.
- 9.2.10 However, since 2014, as availability dipped below 8.0% and has stayed below this level ever since at the national level, real rents have grown strongly year-on-year. During this period, net absorption has been lower than the 2009-2014 period despite the I&L sector going from strength to strength. This clearly shows the suppressing nature tight availability (below 8.0%) has had on I&L demand nationally.

Figure 9.1 Historic Net Absorption (sqm), Availability (%), and Real Rental Growth (%) in England



Source: CoStar, OBR, Savills

9.2.11 The 8.0% benchmark is also applicable to Buckinghamshire, given the I&L market has broadly followed the same trajectory as the national market. I&L availability in Buckinghamshire has been below the 8.0% equilibrium for all of the last decade (Figure 4.2) similar to the national market. I&L rents in Buckinghamshire began outpacing inflation from around 2014/2015 when availability dropped below 8.0% (Figure 4.6) similar to the national market. The Council’s own employment evidence (2025 EES) also implicitly supports the use of an 8% equilibrium rate, noting at paragraph 5.26 that 8% reflects “normal levels of market vacancy in employment space”.

9.2.12 The individual steps for calculating the Buckinghamshire’s suppressed demand are as follows:

- Step 1C(i): For years where availability has been below the 8.0% equilibrium threshold, we calculate the quantum of floorspace necessary to achieve 8.0% availability (Column ‘Av. To EQ (sqm)’ in Table 9.1, calculation F);
- Step 1C(ii): We then take the average of the ratio between net absorption and available floorspace for every year over the last 13 years (2012-2024) (Calculation E averages 24% for Buckinghamshire based on Column ‘Net Absorption/Availability’).

- Step 1C (iii): We apply this average to the estimated floorspace required to reach 8.0% availability in each year where the market is below the 8.0% availability threshold to estimate each period's suppressed demand (Calculation F\*E in Column 'Suppressed Net Absorption (sqm)'); and
- Step 1C(iv): We calculate average suppressed net absorption over the last 13 years (2012-2024). This gives the annualised suppressed demand figure to be used as a top-up to the historic trend. The estimated annual average suppressed demand figure for Buckinghamshire it is 9,737 sqm.

9.2.13 Table 9.1 illustrates the relevant calculations for the PMA.

Table 9.1 Suppressed Demand Calculations within Buckinghamshire (sqm)

	A	B	C=(A*B)	D	D/C	F=(8%-B)*A	F*E
Year	Inventory (sqm)	Availability (%)	Availability (sqm)	Net Absorption (sqm)	Net Absorption/ Availability	Av. To EQ (sqm)	Suppressed Net Absorption (sqm)
2024	2,097,069	3.9%	81,786	16,419	20%	85,980	20,279
2023	2,074,101	4.6%	95,409	15,632	16%	70,519	16,632
2022	2,051,437	6.1%	125,138	19,624	16%	38,977	9,193
2021	2,020,334	6.9%	139,403	41,247	30%	22,224	5,242
2020	1,976,837	5.4%	106,749	25,141	24%	51,398	12,122
2019	1,937,918	5.9%	114,337	20,683	18%	40,696	9,598
2018	1,923,020	4.0%	76,921	27,825	36%	76,921	18,142
2017	1,904,800	4.8%	91,430	6,174	7%	60,954	14,376
2016	1,900,337	5.6%	106,419	9,638	9%	45,608	10,757
2015	1,888,618	5.9%	111,428	52,979	48%	39,661	9,354
2014	1,882,105	7.8%	146,804	112,613	77%	3,764	888
2013	1,818,786	10.7%	194,610	41,659	21%	-49,107	0
2012	1,816,432	13.6%	247,035	-35,592	-14%	-101,720	0
					E average	=	Suppressed Demand = Average

Source: CoStar, Savills 2025

- Step 1D: The final step requires adding the combined annualised historic and suppressed demand figures, and multiplying this by the number of years in the estimated period (21 years) as shown in Table 9.2 below. This gives a total floorspace demand of 776,394 sqm in Buckinghamshire over the 21-year period.

Table 9.2 Buckinghamshire Future Demand Estimates and Calculations (sqm)

	Buckinghamshire
(A) Annualised Historic Demand	27,234
(B) Annualised Suppressed Demand	9,737
(C) Total Annualised Demand (A+B)	36,971
(D) Total Demand over 21-Year Period (C*18)	776,394

Source: CoStar, Savills 2025

### Step 2 – Adding an E-Commerce Uplift

- Savills demand estimate factors in future e-commerce growth which is the major growth driver for the sector, driving both demand for the supply-chain, and also the manufacturing of goods.
- After including an e-commerce uplift, we estimate the Buckinghamshire's I&L demand to increase to **845,165 sqm** of floorspace over a 21-year period.
- The additional steps to add in an e-commerce uplift are detailed below.

#### *Step 2: Adjusting for Increases in Online Retail*

- 9.2.14 There are a number of factors driving future growth in demand for I&L uses which are not captured by historic trend-based projections. Attempting to factor them all in is a challenging exercise prone to errors and overestimation due to the uncertainty around major events such as Brexit and the risk of double counting the impacts of different growth factors. The strongest growth drivers are population growth and the move to online shopping, which the Covid-19 Pandemic has accelerated. We consider demand arising from population growth to be largely captured by increases in online sales which are a function of household spending and household growth. For this reason, in our work we focus on the move to online shopping as expressed as pounds spent at the UK level.
- 9.2.15 Focusing on total online spend in pound terms is considered more effective than the percentage of online sales. This is because the percentage of online sales will fail to pick up future growth drivers such as population growth and expected increases in consumption. In this regard, using the total online spend projections will enable these future e-commerce growth drivers to be included within my future I&L demand estimates. This enables a better representation of the increased demand for floorspace needed to process this online spending.
- 9.2.16 In order to estimate future increases in I&L demand linked to e-commerce growth, we first need to establish the share of demand that has historically been linked to e-commerce, and then determine how much higher this is likely going to be in the future. The sectors typically linked to e-commerce are Retail, Transport and Warehousing, and Wholesale. These sectors accounted for 36% of all floorspace leased in Buckinghamshire between 2012 and 2024 according to CoStar data.
- 9.2.17 We have considered Statista's<sup>40</sup> online retail forecasts for the UK to 2029 as a proxy for future online spending growth. Statista is a leading provider of market and consumer

<sup>40</sup> A prominent retail forecasting house

data with over 2 million registered users. Statista’s data only goes back to 2017 meaning only 3 years of data (i.e. 2017, 2018, and 2019) are available before the Covid-19 Pandemic began. We consider at least 5 years of data to be more robust for understanding historic trends. In order to extend Statista’s historic series we have discounted their online spending figure for 2017 by the ONS online growth rates<sup>41</sup> in order to derive an estimate for 2015 and 2016.

9.2.18 Next we compare the historic online spending figures (i.e. 2015-2019) with Statista’s future online spend forecasts (i.e. 2023-2029). To ensure that we are comparing like for like, we convert both the historic and future forecast data into real prices in order to remove the effect of inflation. We do this by rebasing all data back to 2015 using GDP Deflators from OBR March 2025<sup>42</sup>.

9.2.19 As shown in Table 9.3 below, between 2015 and 2019 online retail sales averaged £61.0 billion per annum. We accept that 2020, 2021, and 2022 were exceptional years due to the Covid-19 Pandemic, and exclude them from our calculations. During the period between 2023 and 2029, online sales are predicted to average £86 billion per annum based on the Statista forecasts. This suggests a 41% uplift from the pre-pandemic (2015-2019) online spend average of £61.0 billion per annum based on the Statista data.

Table 9.3 UK Online Sales Forecasts (£ billion)

Year	Online Sales Real Prices (£b)	Annual Increase (£b)	
2015	48.9	-	2015-2019 Average Annual Online Sales Value in Real Prices: £61.3 billion
2016	58.2	9.3	
2017	66.4	8.2	
2018	63.9	-2.5	
2019	68.9	5.0	
Average 2015-19	61.3	5.0	
2020	83.4	14.5	Excluded from calculations as these were atypical years due to the Covid-19 Pandemic
2021	86.4	3.0	
2022	78.1	-8.3	
2023	70.4	-7.7	2023-2029 Average Annual Online Sales Value in Real Prices: £86.4 billion (+41% uplift compared to 2015-2019)
2024	75.5	5.1	
2025	81.7	6.2	
2026	87.8	6.1	
2027	93.3	5.5	
2028	96.8	3.6	
2029	99.3	2.5	
Average 2023-29	86.4	3.0	

Source: Statista, ONS, Savills, 2025

9.2.20 The increase in online spending in real terms indicates that the volume of shipped goods will increase. This in turn will increase the need for I&L floorspace to handle, store, and distribute the increased volume of goods.

<sup>41</sup> ONS, Internet Sales, All Retailing, 2024

<sup>42</sup> OBR March 2025 Economic and Fiscal Outlook: Economic Supplementary Tables

9.2.21 Some of this increase will likely be dealt with more efficient operations in the future. Advancements in technology and fulfilments solutions will lead to increased productivity in the sector. According to Oxford Economics, the productivity per worker within the I&L sector, specifically the key e-commerce related sectors being Transport and Storage, Retail, and Wholesale, is predicted to grow by 19% between 2022 and 2042. We assume that these productivity gains will reduce the need for additional floorspace. To account for this productivity growth in the I&L sector, we adjust down the 41% online spend increase from Table 9.3 above, by the 19% productivity increase. This yields a final online update of 33% as shown in Table 9.4 below.

Table 9.4 Productivity Adjustment

Predicted Increase in Future Online Spend	Future Productivity Gains in the I&L Sector	Uplift Adjusted for Productivity Gains
41%	19%	39% * (1-19%) = 33%

Source: Statista, ONS, Oxford Economics, Savills, 2025

9.2.22 Applying this 33% uplift to the historic demand from e-commerce sectors equates to an uplift of 68,770 sqm in Buckinghamshire, over the 21-year period (Table 9.5).

Table 9.5 Adjusting for Increases in Online Retail within the PMA

	Buckinghamshire	
	Annual (sqm)	Over 18-Year Period (sqm)
E-commerce related (36% in Buckinghamshire)	9,924	208,395
E-commerce related after 33% uplift	13,198	277,166
E-commerce demand uplift	3,275	68,770

Source: Savills 2025; Figures may not sum due to rounding

### Step 2B: Adding E-Commerce Uplift to the Historic and Suppressed Demand Estimates

9.2.23 Adding the e-commerce uplift to the combined historic and suppressed demand estimates yields a total demand of 845,165 sqm for Buckinghamshire. This analysis is summarised in Table 9.6 below.

Table 9.6 Summary of Future Demand (Over 21-Year Period) within Buckinghamshire (sqm)

	Buckinghamshire
(A) Historic demand (net absorption) over 21-years	571,915
(B) Suppressed demand over 21-years	204,479
(C) E-commerce uplift over 21-years	68,770
(D) Total demand over 21-year period (A+B+C)	845,165

Source: Savills 2025; Figures may not add up due to rounding

### Step 3 – Translating Floorspace Demand (sqm) into Land Requirements (Ha)

- This step entails translating the above floorspace figures (sqm) into a land requirement (ha) using an appropriate plot ratio.
- Using a 35% plot ratio, we estimate the level of I&L demand over a 21-year period to be **241 ha** in Buckinghamshire.
- The steps are detailed below.

9.2.24 The above floorspace figures need to be translated into a land requirement using an appropriate plot ratio.

9.2.25 Based on our professional experience and relevant case studies (as evidenced in Section 2, Table 2.2), recent changes in the I&L sector means that occupiers are moving towards larger building footprints and requiring lower site coverage to allow for adequate yard space, cross-docking, sustainable urban drainage, and strategic landscaping. These modern occupier requirements imply a plot ratio in the region of 30% to 35%.

9.2.26 The results using a 35% plot ratio to translate our floorspace demand estimates are shown in Table 9.7 below.

9.2.27 Within Buckinghamshire, we estimate the level of I&L demand over a 21-year period is 241 ha. This is our baseline (upper) demand estimate for I&L demand in Buckinghamshire.

Table 9.7 I&L Demand Estimates over a 21-Year Period (Ha)

	Buckinghamshire
Sqm	845,165
Ha	241

Source: Savills 2025; Figures may not add up due to rounding

### Step 4 – Sensitivity Testing

- To ensure that our modelling process is robust, we carry out a series of sensitivity tests to understand what will happen to future I&L demand in Buckinghamshire should future demand weaken below historic trends.
- The results of our sensitivity tests form our lower bound estimate for Buckinghamshire.
- The steps are detailed below.

9.2.28 Whilst we consider our future baseline demand estimates to be robust and reflective of market signals looking back 13 years (2012-2024), it is important we take account of the fact that the I&L sector has gone through a period of unprecedented growth in recent years (see Section 3), with a number of structural growth drivers accelerating as a result of the Covid-19 pandemic. To ensure our modelling process is robust, we have carried out a series of sensitivity tests to understand what will happen to future I&L demand in Buckinghamshire, should the sector's historic demand performance weaken significantly. Despite seeing no evidence of this occurring in reality currently, it is important we seek to test different scenarios. The results of this sensitivity testing form our lower demand scenario. The sensitivity tests, and the rationale for their application, are as follows:

- Sensitivity Test 1: Remove the e-commerce uplift - under this scenario we remove the e-commerce uplift applied in Savills' baseline scenario (Step 2). This assumes that the currently forecasted growth of e-commerce does not materialise, and that the growth in the value of online retail sales begins to weaken. As a result e-commerce will no longer be considered a significant structural driver of I&L demand. This could be triggered by various exogenous macroeconomic events such as a recession, changes in consumer behaviour, shifts in technology or even regulatory issues. This scenario would therefore have an adverse effect on demand for I&L land.
- Sensitivity Test 2: Remove e-commerce uplift and lower the equilibrium availability rate to 6.0% - In addition to removing the e-commerce uplift, we assume that the market equilibrium rate within Buckinghamshire is at 6%, rather than 8%. While 8% is commonly accepted as the rate when demand and supply are broadly in balance, the I&L market in England and within Buckinghamshire has not reached this level for over a decade. Therefore, this scenario seeks to recognise the market is likely to remain supply constrained for the foreseeable future. We have chosen 6% as a new equilibrium availability rate based on the fact that the average availability rate across England and Buckinghamshire over the period 2012-2024 has been around 6%, reflecting a highly supply constrained market. The result of this change is that additional suppressed demand is only calculated when availability drops below 6% rather than 8% under the baseline scenario. This results in a drop in suppressed demand between 2012 to 2024.

- Sensitivity Test 3: 2012-2019 and 2023-2024 lookback period - under this scenario we use a look back period from 2012-2019 and 2023-2024. In other words we discount the Covid years where at the national level, I&L demand was stronger. We also remove the ecommerce uplift under this scenario. This scenario directly responds to the EES's concerns regarding the forward projection of net absorption which includes the Covid years, in their own demand scenario 2B (see Section 2).

9.2.29 Under all three scenarios we assume a 35% plot ratio to convert floorspace to land requirements. The results of the three sensitivity test are presented in Table 9.8 below.

Table 9.8 Buckinghamshire I&L Demand Estimates over 21-Year Period - Sensitivity Testing Results

	Savills Baseline Demand (Upper) Scenario	Sensitivity Test 1 - No E-Commerce	Sensitivity Test 2 - No E-Commerce + 6.0% Equilibrium	Sensitivity Test 3 -no e-commerce and 2012-2019 and 2023-2024 Lookback Period
Buckinghamshire (Ha)	241	221	180	238

Source: Savills, 2025

9.2.30 Sensitivity Tests 1 and 3 provide broad synergy around a lower demand estimate for Buckinghamshire of approximately 230 ha<sup>43</sup> over a 21-year period.

9.2.31 We consider Sensitivity Test 2 to represent an outlier, as the demand estimates generated under this scenario are significantly lower than those produced by the other sensitivity tests. This divergence suggests that the assumptions underpinning Sensitivity Test 2 may not accurately reflect realistic market conditions or expected development trajectories.

9.2.32 Our demand estimates over a 21-year period for Buckinghamshire are summarised in Table 9.10.

Table 9.10 Buckinghamshire I&L land demand estimates over a 21-year period (Ha)

	Land Demand Estimates (Ha)
Buckinghamshire I&L Demand	230 - 241

Source: Savills, 2025. Numbers may not quite add due to rounding.

<sup>43</sup> Average of Sensitivity Test 1 and 3 for Buckinghamshire is approximately 230 ha.



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