

Ian Kemp
16 Cross Furlong
Wychbold
Droitwich Spa
Worcestershire
WR9 7TA

05 January 2016

Dear Mr Kemp,

Vale of White Horse Local Plan Examination Representations on Behalf of Universities Superannuation Scheme

Introduction

Deloitte Real Estate is instructed by Universities Superannuation Scheme (USS) to advise on planning matters in respect of its industrial assets at Nuffield Way Industrial Estate, OX14 1TR. USS therefore has an active interest in the formulation of planning policy in the District and has previously submitted representations to the Local Plan Part 1 consultations in May 2013 and December 2014.

Matter 12.2 (b) Change of Use of Existing Employment Land and Premises (CP29)

USS's commercial property at Nuffield Industrial Estate falls within the Abingdon Business Park, which is identified in Appendix B of the draft Local Plan as an existing Strategic Employment Site. These sites will be safeguarded for employment uses in accordance with Core Policy 29.

Policy 29 states that alternative uses will be considered on Strategic Employment Sites if they provide ancillary supporting services or meet a need identified through the Local Plan 2031 review process, or exceptionally where a reassessment of the district wide 2013 Employment Land Review demonstrates that these sites are no longer needed over the full plan period.

USS considers this policy wording to be unsound due to it being unnecessarily restrictive. Paragraph 14, bullet point 2 of the NPPF requires the plan making process to be sufficiently flexible to adapt to rapid change and Paragraph 17 bullet point 3 requires that plan making proactively drives and supports sustainable economic development. Alternative employment generating uses such as C1, D2, retail or sui

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 2 New Street Square, London EC4A 3BZ, United Kingdom.

Deloitte LLP is the United Kingdom member firm of Deloitte Touche Tohmatsu Limited ("DTTL"), a UK private company limited by guarantee, whose member firms are legally separate and independent entities. Please see www.deloitte.co.uk/about for a detailed description of the legal structure of DTTL and its member firms.

Member of Deloitte Touche Tohmatsu Limited

generis uses can positively contribute to sustainable employment provision and promote economic growth. Alternative uses can complement existing business functions and offer a higher density of employment opportunities than some B uses, such as warehousing. Restricting alternative uses to those that are considered ancillary provides limited flexibility and requiring needs to be identified through the Local Plan review process does not represent the 'sufficient flexibility to adapt to rapid change' required by NPPF para 14.

In relation to Nuffield Industrial Estate specifically, USS has previously secured a Certificate of Lawful Existing Use for one of the units which is a bulky retail warehouse use. This demonstrates that it is an appropriate location for alternative uses and emphasises the need for flexibility in this policy. USS therefore reiterates the need for the Council to have the ability to assess proposals on their individual merits.

Paragraph 6.34 of the draft Local Plan states that a Local Development Order covers the Milton Park, which is a designated employment site to the south of Abingdon. This LDO permits an element of non-B class employment generating uses (specifically car dealership and private healthcare uses) and also allows for some other uses that will help support the sustainability and viability of the business park, such as small-scale shops and recreation facilities. This LDO demonstrates that the Council recognise the important role of alternative non-B class uses in ensuring the sustainability and viability of employment sites. USS request that CP29 is amended to recognise the important role of complementary and sustainable, non-B class uses on employment sites. This more flexible approach would be compliant with Paragraphs 14 and 17 of the NPPF.

Paragraph 6.37 of the draft Local Plan requires that in order to demonstrate that a site has no reasonable prospect of being used for employment purposes, applicants will be expected to demonstrate that the site is no longer viable for its present, or any other realistic and suitable, employment use by demonstrating that the site has remained un-sold or un-let for at least 12 months. USS consider this proposed timescale to be overly restrictive and contrary to the requirement for Local Plans to '*meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits*', as set out by NPPF paragraph 14. Whilst USS recognise the need to demonstrate that alternative uses are appropriate and will not create any adverse impacts, requiring a unit to stand empty for 12 months before an alternative use can be considered does not allow a quick response to objectively assessed needs and is therefore unsound.

Conclusion

In summary, USS is pleased to have the opportunity to comment on the emerging policy documents, and requests that USS continues to be updated on the progress of these emerging documents. Should you have any queries on this correspondence, please contact Michael Bottomley on 0207 303 5636 or mbottomley@deloitte.co.uk.

Yours sincerely,



Julia Chowings
Deloitte LLP

