

Planning Policy
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Dear Sir/Madam,

**VALE OF WHITE HORSE PUBLICATION STAGE LOCAL PLAN REPRESENTATIONS –
PUBLICATION STAGE – CROWN, DOWNSVIEW ROAD, WANTAGE, OX12 9BP**

CBRE Limited ('CBRE' hereafter) act as planning advisors to Crown Packaging UK Plc (referred to as 'Crown' hereafter) with respect to their site at Downsview Road, Wantage, OX12 9BP. CBRE is instructed by Crown to submit representations to Vale of White Horse District Council's (VWHC hereafter) Publication Stage Local Plan 2031 - Part 1 Strategic Sites and Policies ('the Publication Local Plan') with respect to their Downsview Road, Wantage site.

Crown welcome the opportunity to engage with VWHC in respect of its emerging planning policies and specifically the Publication Local Plan. This representation follows the representation made by CBRE on behalf of Crown during the Spring 2014 consultation.

About Crown

Crown are the world's leader in metal packaging technology and develop all kinds of packaging for every day products. With operations in 40 countries employing over 21,300 people, Crown have 13 sites in the UK including Wantage.

In Wantage, Crown employ circa 340 people (the peak in the 1980s was 600 research and development (R&D) staff). Wantage is Crown's main base for R&D with 180 R&D staff employed in this location (the other 60 are based in Chicago). The R&D activities that take place on site include developing new products, process improvements, maintenance of standards and specifications, and technical support provided to Crown's plants and those of its customers and licensees around the world. The other jobs at Wantage are business technical staff, IT staff, finance and administration. 70% of staff at Crown in Wantage are graduate level educated in technical jobs.

Site Location and Description

The site itself comprises 7.2 ha and is situated to the northwest of Wantage, and south of Grove along Downsview Road. It is split between two separate parcels (6 ha and 1.2 ha sections split by the access road). The site itself is surrounded by consented residential development (Grove Airfield to the north and Stockham Farm to south and east). With the new consented development in place the site will be part of the developed area of Wantage.

The site is also located close to Grove Technology Park which is circa 1 mile away further along Downsview Road.

Property Description

The property itself is a stand-alone facility, comprising a building, constructed in the 1970s. It comprises approximately 50% offices/research and development labs and 50% warehouse. The offices are largely two storey brick built with flat roofs and the warehouse is mainly single storey, flat roofed constructed with 1/3 brick at lower level and profile steel cladding above. The building itself is circa 300,000 sqft. Given the reduction in staff numbers over the years and changing working patterns **today over 40% of the office space is unused and over 30% of the testing areas.**

The site was previously owned by the Atomic Research Establishment and was purchased by Metal Box in the mid 1970s (Metal Box later became part of Crown). The site was redeveloped at that stage to meet the very special needs of the metal packaging company. The very bespoke design includes office space, laboratories, warehousing, area for pilot equipment, engineering workshops, a food and beverage hall (to replicate customers' filling facilities), temperature controlled rooms, a technical library, a lecture theatre as well as restaurant and conference facilities. The buildings as they stand today were opened in 1979.

Given that the site is now very outdated, Crown are finding that it has high running costs, high energy consumption, complex access arrangements and that major parts of the building infrastructure have reached the end of their useful life and are now very costly to maintain. The building has no double-glazing, an exceptionally large external surface area for its size, and generally poor standards of insulation.

The property provides relatively poor working conditions by modern standards, which impacts Crown's ability to recruit and retain the best employees. Crown also find it increasingly difficult to maintain a modern, professional image to visitors. The site attracts a large number of visitors (circa 12,000 visitors per annum), many of whom travel from abroad.

Importantly given the extent of R&D work that is carried out on site, Crown are finding that the design and layout of the building is not conducive to R&D activities. Building design and layout has been shown to significantly affect the productivity and effectiveness of R&D staff in particular. Various studies show that distances between people, the lack of readily accessible conference rooms, and the lack of "social spaces" in the workplace significantly inhibit informal communications and the exchange of ideas and information. Being efficient in making such connections is frequently key to maintaining competitiveness, facilitating the development of innovative ideas and minimizing time to market. Even distances between desks and laboratories or test equipment can negatively impact productivity. The basic design of the building in Wantage is poor in this respect and a simpler, more compact design would give significant advantages and improve Crown's ability to remain competitive.

Crown's Need to Relocate

Recognising the trends in a falling workforce and demands for less space with technology efficiencies Crown concluded around 10 years ago that they would need to relocate, and that the project would need to be self-funding. The funds from the sale of the site need to be able to fund the new site, which ideally would be specially developed to meet their specific needs.

In December 2002, Crown wrote to VWHC explaining the position and requesting that, within the framework of the new Local Plan, the site be reallocated for residential use. Crown attended a planning inquiry in 2005, at which time they had conducted a comprehensive site search in the local area and had inspected 3 suitable sites to which they could have relocated. The site was not reallocated at that time and Crown were unable to finance their relocation. Had Crown been able to

relocate successfully, it is likely that many of the 70 job losses since 2005 (driven by corporate cost reduction demands) could have been avoided.

Planning Opportunity

In summary the redevelopment of this brownfield site for residential use will be in keeping with the area, and the surrounding context of recently consented developments and the town of Wantage. The site has the potential to deliver over 250 homes and will therefore make a significant contribution to meeting local housing needs.

The redevelopment of the site will also fundamentally enable Crown to finance their new site and allow highly skilled jobs to remain within the local area.

In relation to the planning position of the site we have a number of comments on the Publication Stage of the Plan in order to ensure that it meets the tests of soundness as set out in paragraph 182 of the National Planning Policy Framework which sets out that:

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

We consider the relevant emerging policies below against the tests of soundness and also provide general observations in relation to the policies.

Core Policy 2 – Cooperation on Unmet Housing Need for Oxfordshire

Core Policy 2 on Cooperation on Unmet Housing Need sets out that the March 2014 Strategic Housing Market Assessment (SHMA) identifies a significant level of housing need in Oxfordshire, and in particular refers to VWHC needing to meet its own needs first before it considers meeting the needs of any adjoining authorities through either a partial review of the Core Strategy or a subsequent development plan document. It notes that Oxford City Council in particular is reviewing the extent to which it can meet its own needs. However given Oxford City Council has a need of between 1200-1600 dwellings per year compared to its previous target of 400 dwellings per year, and it's tightly drawn boundaries and limited availability of sites, it is highly unlikely to be able to meet its needs. We believe that failing to address this at this stage in the VWHC Local Plan could potentially present a missed opportunity to identify strategic sites. It also poses the consideration as to whether the **positively prepared** test of soundness has been achieved and whether the procedural requirements of the Duty to Cooperate have been met.

Chapter 3 – Spatial Vision and Strategic Objectives

The spatial vision sets out that the service centre roles of Abingdon-on-Thames, Botley, Faringdon,

Grove and Wantage will have been maintained and enhanced. This chapter sets out the Strategic Objectives for the District. Under the heading Building Healthy and Sustainable Communities, we support the objectives in particular objective S0 3 to direct growth to the most sustainable locations in the District, ensuring development is integrated with and respects the built and natural heritage and creates attractive places in which people will want to live, as well as being supported by a sufficient range of services and facilities.

Chapter 4 – Spatial Strategy

The Spatial Strategy has three main strands. These seek to:

- focus sustainable growth within the Science Vale area
- reinforce the service centre roles of the main settlements across the district, and
- promote thriving villages and rural communities whilst safeguarding the countryside and village character.

The Spatial Strategy makes provision for growth of around 23,000 new jobs, 219 hectares of employment land, and at least 20,560 new homes, to be delivered during the plan period from 2011 to 2031. The Strategy will allocate land for strategic housing growth at 5 key locations including Grove and Wantage. Growth is focussed on the Science Vale Area. We generally support the spatial strategy although we note as referenced above that there is the potential to identify more housing sites in light of the wider housing need within Oxfordshire. We have also reviewed the evidence base in relation to employment land and note that there is significant amount of employment land identified and consider that there is a significant surplus as discussed under our observations of *Core Policy 29 – Change of Use of Existing Employment Land and Premises* below.

Core Policy 3 - Settlement Hierarchy

This policy sets out that Wantage where the site located is a market town and that market towns “*have the greatest long-term potential for development to provide the jobs and homes to help sustain, and where appropriate, enhance their services and facilities to support viable and sustainable communities in a proportionate manner*”. We support Core Policy 3 Settlement Hierarchy in recognition of the sustainable location of Wantage for housing growth.

Core Policy 4 - Meeting Our Housing Needs

This policy sets out that the housing target for VWHC is for at least 20,560 homes to be delivered during the plan period.

The policy sets out that development will be supported at strategic site allocations where they meet the requirements of the Development Site Templates and meet the policies in the Development Plan taken as a whole.

We support the allocation of strategic sites and contend that Crown’s site has suitable credentials to be put forward for a strategic residential allocation able to deliver at least 250 homes, and this will also help VWHC meet its housing needs. This will be particularly important to seek to ensure that VWHC can deliver its housing need which as set out in the *VWHC Meeting the Objective Assessment of Housing Need Paper – Oct 14*, is going to be challenging as previously VWHC have typically delivered only 400 dwellings per year rather than the 1028 now required.

There is also the potential for the large number of strategic sites to be slow to deliver housing. Therefore introducing this further site will enable a medium sized site to play a role in contributing to housing delivery.

In terms of the strategic sites, it appears that in order to meet the overall spatial strategy and the focus on the market towns, further strategic development, over and above that identified, could be located at Wantage, in order to enable the settlement hierarchy to be maintained as set out in Core Policy 3. This is by comparison to the smaller settlements which have had more than a proportionate amount of development attributed to them e.g. Valley Park in the Harwell and Milton parishes.

We have also reviewed the *Strategic Site Selection Topic Paper* (Nov 2014) and note the methodology for assessing sites. We note that the methodology does not reference employment designations and that the site performs well against all criteria set out at Stage 3 which is the point at which it appears to have been discounted. This is because the site is free from planning and environmental constraints and fits well with the wider spatial strategy.

Core Policy 5 - Housing Supply Ring Fence

This policy sets out a housing supply ring fence area, where housing delivery will be assessed separately, with a separate requirement for housing over the plan period, in recognition for the amount of jobs planned for this area.

The site appears to fall within the ring fence area being shaded pink on Figure 4.3, although this could be made clearer. As set out in paragraph 4.22 – we support the recognition that the ring fence area is the most sustainable area for new residential development and contend that the site could contribute significantly towards this.

Core Policy 15 - Spatial Strategy for South East Vale Sub-Area

This policy sets out that development will be in accordance with the settlement hierarchy in Core Policy 3, and again sets out that Wantage is a market town and Grove is a Local Service Centre, with the remaining settlements in the South East Vale Sub-Area being larger and smaller villages.

The policy sets out that 12,450 new homes will be delivered in this area in the plan period, including 10,320 through the strategic allocations, with the remainder to be identified through the Local Plan Part 2 or (Up to 56) or through windfalls (164 units), with known and estimated completions between April 11 to Mar 2015 being 576 dwellings.

The policy notes the 'Housing Supply Ring-Fence' in accordance with Core Policy 5 whereby 11,850 new homes are ring fenced for the purposes of assessment of housing land supply.

In terms of distribution Core Policy 15 sets out that 1,500 will be distributed to Wantage and 2,500 to Grove as the main settlements with the remainder being distributed to the villages. In accordance with the settlement hierarchy we note that further residential development could be allocated in Wantage in recognition of its Market Town position in the settlement hierarchy. This will serve to maintain the settlement hierarchy as the smaller villages have significantly more new development attributed to them than the main towns e.g. Valley Park in the Harwell and Milton parishes..

In terms of employment the policy notes that strategic employment sites will be safeguarded for employment use in line with Core Policy 29, and lists the Crown Downsview Road site as a strategic employment site. We consider that the continued identification of the Crown Downsview Road site as a strategic employment site **is not consistent with national policy, effective or justified**. See our comments under Core Policy 29 below which apply equally to Policy 15.

Paragraph 5.85 of Chapter 5 Spatial Strategy for South East Vale Sub Area sets out that an Area Action Plan will be prepared for the Science Vale area. We support this to ensure that as noted in Paragraph 5.85 "a high quality of development informed through the preparation of both strategic and an urban design framework for the area" is achieved.

Core Policy 17 – Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area

This policy sets out the infrastructure identified to support the Science Vale Area Strategy. At Wantage this includes the West Wantage Relief Road. We support this infrastructure improvement and also contend that the allocation of this site for residential redevelopment could support this wider aspiration to deliver the link road.

Core Policy 29 - Change of Use of Existing Employment Land and Premises

In relation to the strategic employment sites which the Crown site has been identified as in the Sub-Area Strategy, Policy 29 sets out that

“the strategic employment sites, as listed in the sub-area strategies, form part of the District’s reserve for employment land to meet objectively assessed employment needs and will be safeguarded for employment uses. Alternative uses will be considered 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”.

The policy then goes on to set out that *“Elsewhere in the District, applications for the change of use of land or premises that are currently, or were last, used for employment purposes will need to demonstrate that at least one of the following criteria is met:*

- “i. there is no reasonable prospect of the land or premises being used for employment purposes:*
- ii. the land or premises is unsuitable for business use on grounds of amenity, environmental or highway safety issues*
- iii. the land or premises has no long term or strategic requirement to remain in employment use, or*
- iv. the proposed use will be ancillary to the use of the land or premises for employment purposes.*

This policy sets out the Council’s approach to assessing proposals for change of use. The supporting text for example at paragraph 6.32 sets out the need to protect important employment sites to ensure that the overall employment provision is increased over the plan period. Paragraph 6.37 sets out that *“in seeking 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. They must demonstrate that the site has remained un-sold or un-let for at least 12 months. In addition, applicants will need to provide evidence relating to the marketing of the site for its present use for a minimum period of 12 months up to the date at which the planning application was lodged. This should demonstrate that despite genuine and sustained attempts to sell or let a site on reasonable terms for employment use, they have failed to do so”.*

In terms of the Employment Land Review (2013) which is a key evidence base document underpinning the Publication Local Plan, this sets out that there is a demand for 145 ha of employment land vs a supply of 180 ha. Despite this it recommends a precautionary approach is taken, retaining the 2011 site allocations until further information is known about future demand. **It is recognised in the Employment Land Review that it is not known if there will be demand for this surplus land.** The Employment Land Review (2013) also sets out that most demand will be focussed on the Enterprise Zones.

The 2014 update to the Employment Land Review recognises that there will beyond this actually be **significantly more land available as an increased amount of employment land exists in the Science Vale than previously understood.** 122 ha is available rather than the 92 ha identified in the 2013 Employment Land Review. Accordingly it appears that the **surplus employment land is even more**

significant than that identified in the 2013 ELR at 67 ha. The 2014 update to the Employment Land Review sets out that there are more than sufficient sites across the District where the identified 23,000 new jobs related over the plan period could be located.

The NPPF is clear as set out in paragraph 22 that *“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities”*.

We also note that paragraph 51 of the NPPF sets out that Councils *“should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate”*.

Given the above and to assess whether the site could be sold viably or re-let as an employment site, we have asked local agents to conduct a Market Assessment of the Site which demonstrates that there is no reasonable prospect of the Site being re-let/ or sold when it becomes vacant. A summary of the key considerations include:

- Grove Technology Park, circa 1 mile from the site has significant vacancies on the site. It is also for sale and has been on the market for at least 9 months without offers. We understand that given the lack of interest, the price was lowered from £15m to £10m. We understand that given the lack of interest the price may need to be lowered further. This clearly indicates that there is a lack of demand in the local area. It also indicates that the Crown Wantage site is even more likely to remain unsold should it be put on the market as it is of a significantly poorer quality and significantly smaller than the Grove Technology Park. It should also be noted that the current price for the Grove Technology Park would not be sufficient to allow Crown to fund their new facility.
- The total size of the buildings will not appeal to the open market – 300,000 sq ft is too big for the local market. There are currently no enquiries for properties of this size in the Wantage market.
- Occupiers prefer to be nearer larger conurbations such as Oxford, Swindon or Reading especially for quick access to the M4 motorway and larger populations. Even proximity to the A34 would be better for occupiers if they were located at Didcot. Wantage is too far from these main arterial routes due to the high costs of vehicle movements.
- The split of the accommodation will not appeal to the occupational market – for either warehouse/logistics or industrial markets. 50% (142,000 sq ft offices)/50% (147,000 sq ft industrial) split is never required by modern day occupiers.
- Laboratories and R&D offices will only appeal to a very small sector of the UK occupier market. It is highly unlikely that a modern day R&D occupier will want to consider accommodation which was built in the 1970's due to lack of quality of the existing accommodation – although well maintained the subject premises are very outdated in terms of specification and offers very limited flexibility.
- The specification of the existing accommodation is now outdated – in terms of occupational requirements from today's occupiers.
- Running costs of the existing buildings will preclude occupiers/investors from considering occupation. Modern day occupiers are aware of the corporate social responsibility to the environment. The subject site will impact on an occupiers CSR programme.

- The proximity of new residential development surrounding the site will preclude 3PL's (3rd party logistics operators), distribution companies and some engineering operations from locating on site due to potential complaints in relation to noise and fumes abatement orders.
- General lack of requirements for industrial accommodation in the Wantage area.
- The site doesn't lend itself very well to being split – the configuration of the units means that all the lorry movements will have to go to the rear of the site past the office accommodation (if they were to be retained).
- Site levels change from front to back which will not appeal to occupiers – impact on commercial vehicle movements and loading.

Given that the Council's Employment Land Review (2013) and the 2014 update both demonstrate that there is significant surplus employment land, and the Market Assessment it is considered that it is no longer appropriate to retain the strategic employment land allocation for this Site, and indeed this is even more important given that Crown will be leaving the facility which was purpose built to meet their specific needs and will therefore be vacant. We therefore strongly contend that the site should have its strategic employment designation removed.

We consider that the long term protection of the site as a strategic employment site is overly prescriptive. Furthermore it does not provide flexibility for the presumption in favour of approving applications for change of use a set out in paragraph 51 or with the general presumption in favour of sustainable development set out in the NPPF. Accordingly we consider that this policy not consistent with national policy and accordingly fails to meet the **consistent with national policy test of soundness**. These comments also apply to Policy 15 – whereby the Downsview Road is referred to as a Strategic Employment site.

Furthermore given the pressing housing needs within VWHDC and the wider Oxfordshire Area, the site would be better placed to be developed for housing given that it represents a sustainable location, is brownfield and would contribute significantly to meeting housing needs.

We consider that this policy (as well as Policy 15) has the potential to fail to meet the **effective** and **justified** tests. This is because based on the evidence available (including the Council's own Employment Land Review) there is evidence of a significant surplus of employment land in the District, and that demand for employment is focussed more on the Enterprise Zone rather than this location. The Market Assessment we have commissioned has been provided to understand what the demand for the site would be and whether the site could viably be relet/sold. This Market Assessment demonstrates that there is no reasonable prospect for the site being re-used for employment use. Retaining this site as an employment site will not be viable and therefore not deliverable over the plan period.

We contend that given this and Crown's need for better premises, and given that it is already significantly underused, the strategic employment designation should be removed from Policy 15.

Beyond this we also consider that policy 29 and the supporting text should be amended to ensure that it is **effective, consistent with national policy and positively prepared**. The supporting text in paragraph 6.37 should be amended to remove the wording *"They must demonstrate that the site has remained un-sold or un-let for at least 12 months. In addition applicants will need to provide evidence relating to the marketing of the site for its present use for at least 12 months up to the date the planning application is lodged"*. This requirement for 12 months of marketing before the application is submitted is considered to be excessive and overly prescriptive particularly as the text already notes that towards the end of paragraph 6.37 that it must be demonstrated that despite genuine and sustained attempts to sell or let a site on reasonable terms for employment use, they have failed to do

so. These amendments will ensure the policy is not overly prescriptive, that it is flexible and able to respond to changing circumstances. This will ensure that the policy is effective over the plan period and consistent with national policy which seeks to ensure that the presumption in favour of sustainable development can apply for planning applications where development which is sustainable, as in this case, should be approved without delay.

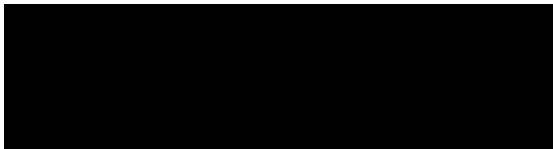
Furthermore we contend that the policy is not currently clear as drafted. There appears to be a distinction between how strategic employment sites are treated and how other employment sites are assessed. This may be rectified by removing the wording 'Elsewhere in the District'.

Summary of Opportunity

In summary the Crown, Downsview Road, Wantage site provides an excellent opportunity for a residential allocation which can deliver at least 250 homes. The site is a brownfield site in a sustainable location which accords with the wider spatial strategy and the wider national policy agenda for development on brownfield sites. Crown have an urgent need to relocate to a smaller more efficient facility within the local area which will enable them to retain their highly skilled jobs within the VWHC area. The redevelopment of their site for residential use will allow them to finance their new site which will not be possible if the redevelopment is not supported by the Council, leaving to the potential for Crown to leave the VWHC area completely. Finally there is a significant surplus of employment land within the District and market signals indicate the site is highly unlikely to be re-let or sold for employment use. It is therefore critical the strategic employment designation is removed.

If you have any questions please do not hesitate to contact myself or my colleague Isabel Keppel (isabel.keppel@cbre.com or 020 7172 2031).

Yours sincerely



JONATHAN STODDART
DIRECTOR

Enclosed

Site Location Plans