

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Universities Superannuation Scheme ()
Comment ID	LPPub892
Response Date	18/12/14 16:39
Consultation Point	Core Policy 29: Change of Use of Existing Employment Land and Premises (View)
Status	Submitted
Submission Type	Web
Version	0.2
Q1 Do you consider the Local Plan is Legally Compliant?	Yes
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? Yes

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Deloitte Real Estate is instructed by Universities Superannuation Scheme to advise on planning matters in respect of its commercial property at Units 1-4 Nuffield Industrial Estate, Eyston Way, Abingdon. The Site is located approximately a mile to the west of Abingdon town centre and is part of the Abingdon Business Park. USS therefore has an active interest in the formulation of planning policy in the District of Vale of White Horse.

Nuffield Way industrial Estate is identified as being a Strategic Employment Site by Core Policy 8. 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 objects to this policy [Core Policy 29] wording and considers it to be unsound due to it being unnecessarily restrictive. USS requests that the council acknowledges the important role that sustainable alternative employment generating uses can have in the promotion of sustainable economic growth. Alternative uses such as classes C1, D2, retail or sui generis uses can positively contribute to employment provision and existing employment sites should not be constrained to the more limited range of uses set out in the policy when they may not be viable. Alternative uses can complement existing business functions and offer a higher density of employment opportunities than some B uses, such as warehousing. This more flexible approach would be compliant with Paragraphs 14 and 17 of the NPPF.

In relation to Nuffield Industrial Estate specifically, USS has recently secured a Certificate of Lawful Existing Use for one of the units which is a bulky retail warehouse use. Furniture Village also occupy a further unit on the estate. 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.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See Q4.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No - I do not wish to participate at the oral examination