

VALE OF WHITE HORSE DISTRICT COUNCIL

LOCAL PLAN PART 1 EXAMINATION HEARING

INSPECTOR'S REQUESTS FOR INFORMATION FROM THE COUNCIL

INSPECTOR'S REQUEST:

I would be grateful if the Council would provide a comprehensive, paragraph by paragraph response to the points raised by Oxford City Council in paragraphs 7 – 20 of HEAR18.

COUNCIL'S RESPONSE:

Paragraph 7

From the additional paper, it is now understood that there is a total of 380 ha of land being allocated for employment uses within the Vale. It is irregular, and of significant concern, that there is some 216 ha of additional employment land being allocated in addition to the 164 ha reported in the CE/SQW Economic Forecasting report ECO02. This is an increase in employment land area of some 132%. The CE/SQW Economic Forecasting report is a common evidence base agreed by all the Oxfordshire districts and County Council, and is integral to the SHMA. The lack of any consultation on this departure from the CE/SQW report is a clear breach of the Duty to Co-operate.

The Local Plan 2031: Part 1 sets out a clear strategy for allocating employment land in the district up to 2031 to support economic growth in accordance with the Oxfordshire Strategic Economic Plan. In total, the plan is seeking to support the delivery of 23,000 jobs and is informed by up-to-date and detailed evidence. This evidence includes the Employment Land Review Update 2013 (ECO01), the Economic Forecasting to inform the Oxfordshire SEP and SHMA (also known as the CE/SQW Report – ECO02) and the subsequent Employment Land Review Addendum 2014 (ECO01.2).

The figures referred to by Oxford City Council relate to the following:

- | | |
|--------|--|
| 380 ha | This figure is the total amount of employment land within the district, and includes employment land that has already been developed. It is not a reflection of the amount of land being allocated to deliver new employment in this Local Plan. |
| 164 ha | This figure is that contained in Table K.4 of the CE/SQW Report (p.118). Table K.4 was an informative table supplied by Vale of |

White Horse District Council to the consultants preparing the CE/SQW Report. Table K.4 represented the amount of employment land available at the time, which has since been updated, and is not an output from the CE/SQW Report. Its contents did not directly influence the forecast 23,000 jobs for the district up to 2031. This is clarified in an email from SQW, attached as **Appendix A**. Following receipt of the CE/SQW Report, Vale of White Horse District Council prepared an Addendum (ECO01.2) to the Employment Land Review which examined the outcomes of the economic forecasting. The Addendum confirms that the total amount of land (219 ha, more recently corrected to 218ha) provides sufficient capacity to meet the forecast 23,000 jobs in the district.

216 ha This is the figure that represents the difference between the two areas reported by Oxford City Council (380 ha and 164 ha) and does not relate to any areas of land identified or allocated for employment.

Through seeking to meet our own housing and employment needs in full within our district, there is no breach of the Duty to Co-operate on this matter.

Paragraph 8

It is also misleading for Core Policy 6 refers to the allocation of 219 ha + 24.2 ha which totals 243.2 ha, which is not consistent with the 380 ha total stated.

This statement is incorrect. The total amount of vacant/developable employment land referred to in Core Policy 6 (219 ha; now amended to 218 ha) does include the 24.2 ha; this is clearly shown at the end of the first table of Core Policy 6. The second table provides more detail on where the 24.2 ha is located within the district. Core Policy 6 identifies 218ha of vacant/developable employment land which will enable the Council to support the delivery of 23,000 jobs, forecast for the plan period.

Core Policy 6 does not refer to employment land that is already developed across the district, i.e. the 380 ha figure referred to by Oxford City.

Paragraph 9

The note still does not provide a clear picture of which areas of land are allocated for employment uses within the Plan period. For example the table on page 7 of HEAR04 shows 'available land' at Harwell campus as 94+35 = 139 ha (confirmed in paragraph 4.3). Yet paragraph 4.2 reports Harwell total allocation of 290 ha which includes a 'licensed site' being decommissioned and not available. It is not clear if the whole balance (of 290- 129 = 161 ha) relates to the licensed site (clearly this is a huge area of land capable of accommodating perhaps thousands of jobs). There is also no explanation of why this large area is allocated when it is

considered as ‘not available’ (and therefore not deliverable within the Plan period).

Clarity is provided on this matter in the Council’s response to the Inspector’s request for clarification on employment land at Harwell Campus¹, which sets out the following:

274 ha² This relates to the whole of the campus site which is allocated in Local Plan 2031 Part 1, and which is allocated for employment land in the existing Local Plan 2011. The whole site is designated for employment use and this is envisaged to form its long-term use. However, not all of the site is available for employment development within the plan period.

128 ha³ This figure refers to vacant land which is available for employment development at Harwell Campus and expected to come forward within the plan period.

This consists of:

93 ha	Enterprise Zone
35 ha	At Harwell Campus, but outside the Enterprise Zone

The remaining 146 ha of the 274 ha comprises of developed land (55 ha), the ‘licensed site’ (35 ha) and other vacant, but not developable land (4 ha). The 146 ha has no reasonable prospect of becoming available in the plan period nor is it expected to contribute towards the forecast growth of 23,000 jobs in the district. Nonetheless it is important this land is retained for employment use in the long-term, as this will allow Harwell Campus to continue to develop and maintain its leading role for innovation and scientific research in the long-term.

Paragraph 10

The Table on Page 7 highlights the differences in the assumptions in the CE/SQW report (ECO02) and the allocations insofar as they are shown in Core Policy 6. It is acknowledged that the Harwell Enterprise Zone area changed between the original submitted and final designation. What is not clear is whether SQW adjusted their assumptions to reflect this, given that Appendix K of ECO02 specifically referred to 163.97 and not the higher figure incorporating this (which would logically be c.173 ha to include the 9 ha added to the Enterprise Zone). It is suggested that, for the avoidance of doubt, SQW are invited to confirm that this is a

¹ Submitted alongside this document

² Please note the council originally identified the site area as c.290 ha, which has since been corrected to 274 ha following accurate calculations using GIS

³ Please note this area was originally identified as 129 ha and has since been corrected to 128 ha following accurate calculations using GIS

typographical error and that the assumption underpinning their work is consistent with the revised EZ area.

SQW have confirmed that this is the case in their correspondence which has been attached to this document as **Appendix A**.

Paragraphs 11 and 12

The addition of 35 ha of land at Harwell outside of the Enterprise Zone is also highlighted. VWHDC consider that this is justified because ECO02 identified that growth additional to those planned would be expected to take place within or adjacent to the Enterprise Zone in the short and long term. To quote directly from Table K.4 of ECO02 (see page 119), under the justification for ‘potential uplift’ to committed development it is stated:

“There is also scope for substantial additional development at Harwell – at least 20 ha should be available for development in the short term over and above the EZ area, and more long term.”

The full wording therefore indicates that there is scope for this additional development at Harwell, but only speculates a figure of 20 ha (substantially less than the 35 ha proposed for allocation) and, unlike for other potential sources of uplift, does not quantify the number of additional jobs or indeed additional employment floorspace that this translates to. It also makes clear that this relates to the short and long term, making no assumption about what might be delivered in the Plan period. It is therefore doubtful that the Economic Forecasting jobs total of 23,000 incorporated an assumption that 35 ha of additional land at Harwell would come forward as an allocation in LPP1.

The key purpose of the CE/SQW Report (ECO02), as stated in the first paragraph of the report is “to prepare a set of economic forecasts for Oxfordshire, to be used in the county’s Strategic Housing Market Assessment and the Local Enterprise Partnership’s Strategic Economic Plan”.

Harwell Campus is a particularly significant site for the Oxfordshire economy and to the UK economy as a whole. The 35 ha of land to the south of the campus, located outside of the Enterprise Zone, is the preferred location for the future ‘big science’ industries on this site. Big Science forms an important part of Harwell Campus and is part of the reason why it is such a unique and valuable asset to the economy. Big Science, as the name suggests, can require a significant land take and it is therefore not appropriate to apply simplistic land requirement assumptions to planning for its future use. The CE/SQW Report, and subsequently the Vale of White Horse Local Plan recognises the need to enable economic growth and this must include consideration of accommodating future Big Science projects.

There are a number of references in the CE/SQW Report to the use of developable, non-Enterprise Zone land at the Campus to accommodate some of the forecast 23,000 jobs in the district. These include:

- p.19 - Table 4.1, reference to 35ha of land outside of EZ at Harwell to deliver jobs;
- p.20, fifth paragraph - "Some growth of employment in the 'big science' research facilities at Harwell (which are not within the designated EZ) is likely, due to increased demand from academic and corporate researchers to use the facilities and the strengthening links with the University of Oxford";
- p.21, first bullet - "primarily in the EZ but also on other land at Harwell";
- p.21-22, last paragraph - reference to 4,000 space science and satellite jobs (separate from jobs on EZ land), of which 2,500 are likely to "cluster around Harwell in Vale of White Horse"; and
- p.30, second bullet of the Conclusions- "We estimate additional growth of around 10,000 jobs is likely to occur in Vale of White Horse... Most of these jobs are likely to be located on existing employment sites, particularly within the EZ and on other land at Harwell".

Paragraphs 13

HEAR04 also notes the addition of 11.2 ha at Milton Hill Business and Technology Park. The explanation for this is that it is identified in the ELR Addendum (ECO1.2) as vacant/developable which updates the previous iteration of the ELR (ECO01). However this provides no explanation as to whether this unexpectedly vacant land was considered in the Economic Forecasting (ECO02) in arriving at their forecasts. It may be that it had already been considered in ECO02 as a commitment rather than as an allocation, however this has not been stated in HEAR04 therefore whether it has been taken account of in the 23,000 total jobs figure remains unclear.

This statement is incorrect. As previously stated, the key purpose of the CE/SQW Report (ECO02) is "to prepare a set of economic forecasts for Oxfordshire, to be used in the county's Strategic Housing Market Assessment and the Local Enterprise Partnership's Strategic Economic Plan".

The clarification email from SQW provided in **Appendix A** below states: "The forecasts, including the Planned Economic Growth forecast, were not constrained by land availability". The CE/SQW Report forecasts the jobs requirement from 2011 until 2031, in line with the timescales for the SHMA.

Milton Hill Business and Technology Park is a saved employment allocation from Local Plan 2011 which is being carried forward into the emerging Local Plan 2031 Part 1. It is not a new employment allocation. In 2006, outline permission was granted for a mixed employment scheme (P06/V1200/O), which resulted in the majority of the site (11.2 ha) being cleared of buildings. An application for an extension of time on the existing application was granted in 2011. This evidence informed the original Employment Land Review

Update 2013 (ECO01), which assumed that the site would subsequently come forward in accordance with the permitted outline application, and consequently did not consider it vacant land as a result. The permitted scheme did not come forward.

In September 2013, planning permission (P13/V1139/FUL) was granted for a “dot com” warehouse (B8) for Tesco on this site. The CE/SQW Report makes specific reference on page 26 that:

“Oxfordshire is also benefitting from investment in retail distribution, with demand from large distribution centres in Didcot from the likes of Amazon and Tesco.”

The CE/SQW Report goes on to state on page 27 that:

“Existing development proposals suggest that there is potential for growth of employment in warehousing and distribution in the order of ... 1,500 in Vale of White Horse.”

This figure of 1,500 jobs forms part of the forecast 23,000 jobs for the district in the plan period. The Employment Land Review Addendum (ECO01.2) takes full account of these facts contained in the CE/SQW Report and correctly reintroduced the vacant/developable land at Milton Hill Business and Technology Park as it will contribute towards the 23,000 jobs.

Jobs versus land supply

Paragraphs 14 and 15

VWHDC state that employment land supply has no bearing upon employment forecasts and the assessment of housing need. This is incorrect on both counts. Whilst the economic growth component of the OAN derived from the SHMA is calculated (as it should be) by job creation that is not the complete picture. It is then necessary to translate that job creation figure into an area of land to accommodate those jobs. There was an extensive discussion at the time between the Oxfordshire authorities reviewing existing and proposed employment sites as a component of the employment forecasts. Cambridge Econometrics / SQW performed that exercise in conjunction with the SHMA work producing the figure of 163.97 ha. Proposals for a total allocation of 380 ha are clearly a major departure from the agreed SHMA with fundamental implications for employment, housing and infrastructure.

If the supply of employment land were truly immaterial to job growth, there would have been no need for CE and SQW to analyse employment sites and sources of supply as they did in their report (ECO02) for example in Table K4.

As stated earlier, the key purpose of ECO02, is “to prepare a set of economic forecasts for Oxfordshire, to be used in the county’s Strategic Housing Market Assessment and the Local Enterprise Partnership’s Strategic Economic Plan”.

380 ha is the total amount of employment land within the district, and includes employment land *that has already been developed*.

The figure of 163.97 ha (rounded to 164 ha and discussed above) is only referenced once in the CE/SQW Report. This figure is contained in Table K.4 of the CE/SQW Report (p.118). The tables in Appendix K were supplied by the local authorities and provided the level of available employment land in the district at a point in time, which has since been updated. As has been explained, the CE/SQW Report focused on identifying the market capacity for growth.

Following receipt of the CE/SQW Report, Vale of White Horse District Council prepared an Addendum (ECO01.2) to the Employment Land Review which critically examined the outcomes of the economic forecasting. The Addendum confirms that the identified land (219 ha, now corrected to 218 ha) provides sufficient capacity to meet the forecast 23,000 jobs in the district.

Paragraphs 16

The first fundamental problem of allocating 380 ha of land relates to the test of deliverability. HEAR04 clearly flags that at least 161ha of land to be allocated would not be deliverable within the plan period. If there is no prospect of the land coming forward within the plan period then it should not be allocated as it is, by definition, not deliverable, and the Plan cannot therefore be effective.

As set out earlier in this response, 380 ha is the total amount of existing employment land within the district; it does not represent land allocated in the Local Plan 2031 Part 1.

To support the delivery of economic growth for Oxfordshire and the Vale of White Horse it is imperative that the existing developed employment sites retain their current role and are appropriately safeguarded from alternative uses in the plan period.

The need to protect the existing developed employment land is evidenced in the Employment Land Review Update 2013 (ECO01 - Recommendation R1 p.77). The Addendum to the Employment Land Review (ECO01.2) adds clarity on where the projected 23,000 jobs are to be located across the district. It identifies 219 ha (now corrected to 218ha) of vacant and developable land *on existing sites* to meet the district’s needs, while ensuring that the strategy maximises the ability to deliver these jobs. It is also important that the ‘licensed site’ (87ha) at Harwell Campus is protected for employment uses to ensure the long term success of the internationally important employment site beyond 2031.

Paragraphs 17

Conversely if the land is allocated then it must be expected that planning applications will follow within the life of the Plan and, being in accordance with the Plan, permissions and employment development of a magnitude well over and above that assumed in the SHMA will be the result. There is in addition 35 ha of land at Harwell which on current evidence has also not been fully taken account of in calculating job creation in the Vale.

This statement is incorrect, and has already been clarified in the council's response to paragraphs 11-12.

Paragraphs 18

Assuming the second scenario, the consequences of oversupply to match the full proposed allocation of employment land are clear. The VWHDC indicated at examination that there was a prospect of delivering above the 219 ha (and by implication well above 23,000 jobs) within the Plan period, reflecting the buoyancy of the high-tech sector in Science Vale. Yet the housing OAN (both for the HMA and the VWHDC administrative area) is directly affected in a fundamental way by the economic growth planned for. Any material oversupply of employment land beyond that used in the SHMA to calculate the OAN renders that OAN incorrect. The impact would be to increase it. However no higher allocation of housing to achieve a true balance of housing to allocated employment has been tested. Further, we have already heard that the County Council does not believe that the current Plan and strategy would provide necessary infrastructure for additional housing growth. The first part of the NPPF paragraph 47 exercise is to consider the OAN for the HMA which clearly cannot be ascertained given the uncertainties apparent in terms of how much employment will be delivered in the Plan period.

This statement is immaterial as the Local Plan 2031 Part 1 and its supporting evidence on housing and employment land seeks to meet the needs of 20,560 homes and 23,000 jobs for the district in full. To meet the employment needs of the district, the local plan is clear on how much land is planned for to deliver against the objectively assessed housing and employment needs in full. Through Local Plan 2031 Part 1, the district is fulfilling its duty in delivering growth for Oxfordshire as set out in the Oxfordshire Strategic Economic Plan and the SHMA.

Paragraphs 19

Section 6 of HEAR04 confirms that the highest housing target tested in the SA/SEA (Option G) was 20,560 homes which is the SHMA figure that reflects 'committed economic growth'. It is clear that a housing OAN that truly reflects the full allocation for employment purposes has not been tested through the SEA process.

This statement is immaterial as the Local Plan 2031 Part 1 and its supporting evidence on housing and employment land seeks to meet the needs of 20,560 homes and 23,000 jobs for the district in full. The Sustainability Appraisal accompanying the local plan has assessed in full the objectively assessed housing and employment needs of the district. The Local Plan 2031 Part 1 has been prepared in full accordance with the SA and SEA processes.

Paragraphs 20

There are also wider implications for infrastructure delivery. Oxfordshire County Council has advised the Inspector that it is content with the Plan's spatial strategy only on the basis of the original supply figures, in terms of delivering the infrastructure only to support the SHMA OAN housing supply and no more. There also remains the Oxford unmet need, which in the City Council's view is the more urgent issue given it is a critical longstanding (and worsening) existing need. An oversupply of employment in the Vale of White Horse as proposed, will increase the overall pressure on housing in the wider HMA, and create competing demands for additional housing delivery in locations remote from Oxford.

This statement is immaterial. The Vale of White Horse District Council is clear on its approach to addressing Oxford's un-met need through the local plan making process, as set out in Core Policy 2. The local plan is clear on how much land is required to deliver the 23,000 jobs in full. Through Local Plan 2031 Part 1, the district is fulfilling its duty in delivering economic growth for Oxfordshire as set out in the Oxfordshire Strategic Economic Plan and in full accordance with the commitments agreed through the Oxford City Deal.

INSPECTOR'S REQUEST:

Can the council please explain the relevance of Table 6.2 in the CE/SQW Report (ECO02)?

COUNCIL'S RESPONSE:

Table 6.2 simply compares the planned economic growth identified within the CE/SQW Report with the jobs 'likely' to be delivered on B Class land based on the capacity of employment sites data provided by the district at the time.

It identifies at a high level (not site specific) if there is sufficient capacity on sites in the district to meet the planned economic job growth of 23,000 identified for the district. This table does not seek to identify the amount of land required to deliver the jobs. As has been discussed, the CE/SQW Report was focused on market capacity rather than land availability.

The district has sought to allocate sufficient land, in accordance with the up-to-date evidence (Employment Land Review Addendum, ECO01.2) to give sufficient choice and flexibility to the market to support the delivery of 23,000 jobs, whilst also giving consideration to accommodating Big Science.

The Local Plan 2031 Part 1 does not deviate from the conclusions of section 6.6, that there is capacity on allocated sites to accommodate the forecast jobs growth. Through the process of reviewing employment land to meet the forecast jobs growth of 23,000, the council has not allocated any new employment sites nor deviated from its strategy for delivering employment growth across the district.

Appendix A – Clarification email from SQW

From: Chris Green

Sent: 26 April 2016 17:35

To: Ronan Leydon <Ronan.Leydon@southandvale.gov.uk>

Subject: RE: Vale Local Plan 2031 Part 1 examination - clarification needed on a couple of points

Ronan

The forecasts, including the Planned Economic Growth forecast, were not constrained by land availability. They are based on expectations of the performance of the Oxfordshire economy, which take into account past trends, the performance of Oxfordshire relative to the SE region and the UK as a whole, and what were then recent policy or investment decisions which could affect future growth but which would not have been reflected in past trends (eg the EZ designation).

You are correct to say that the tables in Appendix K were supplied by the local authorities. Their only purpose was to assess whether the amount of employment land for each of the local authority areas was sufficient to accommodate the expected growth (section 6.6). It was simply a cross check, performed after the economic forecasts had been completed, to inform the local authorities.

We did not check the employment land figures supplied by the local authorities for accuracy. Therefore if there is a typographical error in Appendix K it had no bearing at all on the expectations regarding employment growth at Harwell which are incorporated in Chapter 4. The assumptions underpinning our work are therefore consistent with the revised EZ area.

I hope this provides the clarification you are seeking.

Chris Green

Director

SQW

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