

South Oxfordshire Local Plan 2034

Publication Version Representation Form

Please return by 5pm on Monday 18 February 2019 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@southoxon.gov.uk

This form has two parts:

Part A – contact details

Part B – your comments / participation at oral examination

Part A

Are you responding as an: (please tick)

Agent

Business or organisation

Individual

Due to the plan-making process including an independent examination, a name and contact details are required for your comments to be considered. If you are acting on behalf of another organisation, please provide their details in column one and your company name and contact details in column two.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mrs	
Full Name	Helen	
Job Title (where relevant)	Marshall	
Organisation (where relevant)	CPRE OXFORDSHIRE	
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Part B – Please use a separate sheet for each representation

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph:

EMP 1 - the amount and Distribution of new b-class employment Land

Do you consider the Local Plan and supporting documents:

(1) are legally compliant

Yes

No

Don't know

(2) are sound

Yes

No

Don't know

(3) comply with the Duty to Cooperate

Yes

No

Don't know

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The planned total Employment land is excessive.

The economic forecasts for the increase in employment land needed are based on the Oxfordshire Strategic Economic Plan (SEP) and Strategic Housing Market Assessment (SHMA). The forecasts were made in 2012 (although the SEP was 'refreshed' in 2016 no change was made in the optimistic economic forecasts underlying it). A lot has changed since 2012 – including BREXIT and a continuation of slow economic growth of the UK economy (for example the UK economy will grow by less than 2% in 2017 – this is one third of the year on year economic growth envisaged in the SEP). There is no evidence presented here of the economic growth in south Oxfordshire in the last five years nor of the recent growth rates of Oxfordshire businesses. We therefore contend that the continuing reliance on out of date and unjustified figures to estimate the needs for employment land is unsound and unjustified.

Office of National Statistics figures released in 2017 show an increase of employment in the County of 10,000 part-time jobs and a decrease in 3,000 full time jobs (see [Oxford Times article](#)). It is likely that the part-time jobs are in the retail sector (at, for example the Westgate Centre) and therefore should not need the Employment land envisaged here. There is no analysis here of the types of employment that have been created since the SEP/SHMA reports and what is likely in the next 15 years.

The South Oxfordshire Employment Land Review (ERL) identifies a need for 31.6 Ha of additional land by 2033 (para 6.11). This plan identifies a requirement of between 34.7 and 37.5 hectares of additional employment land in the District over the period 2011 to 2034. No justification is made for this nearly 20% hike and, particularly, given that the original estimate of 31.6 ha is based on very optimistic growth figures we contend that this new figure is unsound.

Policy EMP1 point 1 identifies specific sites equating to 47.2 Ha (incl. 10ha at Grenoble Road), but the wording states “The requirement for 34.7 hectares and 37.5 hectares of B-class employment land will be provided.”

South Oxfordshire has very low unemployment, a very high percentage of economically active people and an ageing population (para 6.6). Therefore the economic growth planned for in this plan will rely heavily on immigration of workers into the District. There is no evidence presented here (or elsewhere) that this will happen and it is made even less likely with government policy designed to reduce immigration into the UK (coupled with the uncertainties surrounding BREXIT). The plan is clearly unsound and against national policy.

10 hectares of Employment land at Grenoble Road. SODC has agreed to meet some of Oxford City's ‘unmet housing need’. However, as far as we are aware, no such request has been made or agreed to with regards to unmet need for employment land.

In terms of South Oxfordshire’s requirements, the other sites already meet the 34.7 to 37.5 hectares that it states will be required.

The exceptional circumstances to remove land from the Green Belt therefore cannot exist.

Oxford City's Local Plan has identified sufficient employment land for its future residents, much of which is near Grenoble Road. Therefore, there is no requirement for a further 10 hectares of employment land to be allocated within South Oxfordshire to meet this need during the planning period. Doing so could jeopardise the delivery of other employment sites identified within both Oxford City and South Oxfordshire.

(Continue on page 4 if necessary)

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination).

It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

Robust evidence is required to show both the ability and desirability of the District growing employment at a rate far faster than the UK average, without jeopardising the quality of life of existing residents or having an adverse impact on other areas of the UK.

The policy itself is inconsistent and needs re-wording to ensure the figures match.

Allocation of employment land at Grenoble Road should be removed from the plan. (SEE ALSO OUR RESPONSE TO STRAT 6 – GREEN BELT)

(Continue on page 4 if necessary)

Would you like to participate at the oral part of the examination, which takes place as part of the examination process? *

Yes

No

* **Please note:** the inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the public hearing.

Signature:

(this can be electronic)

Date:

15.2.19

Sharing your personal details

All comments will be submitted in full to the Secretary of State alongside a submission version of the Local Plan. The Secretary of State will appoint an independent planning inspector, who will carry out an examination of the plan.

Your name, contact details and comments will also be shared with the planning inspector and a programme officer, who will act as a point of contact between the council, inspector and respondents. This means that you will be contacted by the programme officer (and where necessary the council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the planning inspector and programme officer will be kept securely and not used for any other purpose. The inspector and programme officer will retain the data up to six months after the plan has been adopted. South Oxfordshire District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website including contact details. If you would like to know more about how we use and store your data, please visit www.southoxon.gov.uk/dataprotection

Future contact preferences

As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for South Oxfordshire

- I would also like to be added to the database to receive planning policy updates for Vale of White Horse

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Alternative formats of this form are available on request. Please email planning.policy@southoxon.gov.uk or call 01235 422600 (Text phone users add 18001 before you dial).

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