

CPRE Oxfordshire 20 High Street Watlington Oxfordshire OX49 5PY

Telephone 01491 612079 campaign@cpreoxon.org.uk

www.cpreoxon.org.uk

working locally and nationally to protect and enhance a beautiful, thriving countryside for everyone to value and enjoy

South Oxfordshire Local Plan 2034

Matter 9 - Employment land

CPRE Oxfordshire Hearing Statement, June 2020

9. Does the plan make sufficient provision for employment development?

The requirement for 37.5 hectares of employment land to be provided within the plan period is supported by South Oxfordshire Employment Land Review Addendum Final Report South Oxfordshire District Council September 2017¹. The Addendum was commissioned to update the evidence on South Oxfordshire's Employment Floorspace and Land requirements (ELR) to align with the emerging Local Plan period (2011-2033). The 2015 ELR forecast covered 2014 to 2031 and used a different methodology for forecasting future needs to those used for the 2017 review. The 2015 report identified employment land requirements between 16.1ha and 24.6ha over the study period 2014 to 2031. The 2015 report assumed that some vacant employment land would come back into use and help to accommodate planning requirements. In the 2017 review indicative 'planning requirements' were calculated by applying a buffer of 10% to the net employment land requirements to take into accounts factors such as delays to sites coming forward and replacing employment floorspace lost in the future. The overall planning requirement for the scenarios ranges from 19.0ha to 35.9ha for the planning period 2011-2033. The Addendum analysis looked purely at demand and did not take account of supply factors.

The employment land requirement was increased from the maximum in the range (35.9ha) to 37.5 hectares by the Council pro-rata for the Local Plan period 2011-2034². The employment topic paper sets out locations for 47.2 hectares and notes "This figure is **higher than the requirement**, however the Council has sought to ensure it has a sufficient supply of employment land. The Council considers that the proposed allocations have a reasonable prospect of being utilised for employment purposes over the plan period." There is no evidence to justify this statement.

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 $\frac{\text{http://www.southoxon.gov.uk/sites/default/files/15884\%20South\%20Oxfordshire\%20ELR\%20Addendum\%20Final\%20Report\%2004.08.17 \ 0}{\text{.pdf}}$

² http://www.southoxon.gov.uk/sites/default/files/2019-2-04%20-%20820Employment%20Topic%20Paper%20-%20Final.pdf

To summarise, the proposed increase in employment land requirements:

- a. does not take factors such as vacant employment land coming back in to use,
- b. is based on the application of a 10% buffer,
- c. uses the top estimate for land requirements, plus includes the Council's unsupported addition of 9.7 hectares,

Furthermore, the 2017 report states that "Office uses are expected to act as the main driver of B class job growth." and of the 35.9ha identifies 7.8 hectares (22%) for offices use.

Coronavirus & ability to work from home for many, challenges this assumption and the future demand for so much office space must be in question.

We therefore argue that the plan makes over-provision for employment development.

This particularly calls into question the proposed release of 10 hectares of employment land at the Grenoble Road site, within the Oxford Green Belt.

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 the Council states will be required.

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.

The exceptional circumstances to remove land from the Green Belt therefore cannot exist and doing so could jeopardise the delivery of other employment sites identified within both Oxford City and South Oxfordshire.