



**Hearing Statement  
Respondent Reference: 38  
Oxford Centre for Islamic Studies**

**EXAMINATION INTO THE OXFORD  
LOCAL PLAN 2016-2036**

**November 2019**

Introduction

1. This statement is submitted to the Examination into the Oxford Local Plan 2016-2036 on behalf of the Oxford Centre for Islamic Studies (The Centre).
2. This statement responds to each of the issues raised by the Inspectors in their Matters and Issues. The Inspector's questions are italicised with our response in plain font.

Word count: 1,113

## Matter 6- Specific sites

*“Whether the Plan’s site allocation policies are positively worded enough to encourage the delivery of beneficial development on the sites concerned and whether they would allow for sufficient flexibility in the face of future changes in circumstances.”*

### Positively worded and flexible policy

3. The Centre does not consider that the Plan’s site allocation policies are positively worded enough, nor that they provide the flexibility required by the NPPF, in particular paragraphs 11 and 81, they therefore consider them to be unsound.
4. In particular the provision *“Planning permission will not be granted for any other uses”* is considered contrary to the NPPF. While the response of the Council upon this issue is noted (OCC.1.AB) the Centre remains of the opinion that the arbitrary exclusion of potential alternative uses for sites is unjustified and would serve to discourage developments which could benefit the city.
5. The Centre shares the Inspectors’ view expressed in IC.1.C that the provision *“planning permission will not be granted for any other uses”* is incompatible with the NPPF and agree it must be removed from site allocation policies, including SP17, if the Plan is to be considered sound.
6. The NPPF quite reasonably anticipates that circumstances of a site or plan area will change during the life of a Local Plan and so requires that planning policies should be sufficiently flexible to allow a rapid response to change. As drafted the rigid and prescriptive policies do not provide the flexibility required under paragraphs 81 and 120. The application of the provision means the effectiveness of the Plan’s site allocation policies will be undermined as a whole.
7. In addition to concerns with regard to the restrictive provision generally applied to site allocation policies the Centre also has concerns with regard to the prescribed uses under site allocation policy SP17, in particular the exclusion of commercial use.

8. The Centre has an aspiration to include complementary commercial research and development use within a site redevelopment to complement academic research. The commercial activities would be ‘spin-out’ application of research as is the norm in the modern academic arena owing to obvious benefits from the co-location of cutting edge academic research and its commercial application. The Centre plans to develop academic research projects in the fields of science and technology and has an existing, strong research interest in Islamic finance. The opportunity for this research to be applied in a commercial setting on-site should serve to support and enhance the academic endeavour of the Centre, not dilute it. The co-location of research and associated business is for example a feature of the HB Allen Centre, a recent successful development in the city by Keble College.
9. No justification has been provided by the Council for the arbitrary exclusion of complementary commercial use which can serve to support and stimulate academic endeavours.
10. The provision of B1 use at the site would be beneficial for two reasons. (1) Allowing research and industry to be located with complementary academic research reduces the need for shared workers and/or researchers to travel between sites, thereby reducing journeys. (2) Allowing good research to ‘spin-out’ into commercial enterprise can generate employment opportunities in associated service roles and high-skill research positions, helping a broad cross-section of the Oxford community to access opportunities for high quality work experience and career enhancement.
11. The intended business use is intrinsically linked to the academic function of the site, and desirable to allow research undertaken to flourish. Successful academic work can often branch into commercial applications which are economically advantageous to the City. The Local Plan aspires to strengthen prosperity, to support and manage innovation in the fields in which Oxford excels. Complementary B1 use is entirely in line with this.
12. It is also a relevant consideration that the site features existing buildings with established lawful commercial use (B1). The Local Plan seeks to protect employment uses (policy E1) it is therefore perverse that the Plan encourages its removal from the Centre’s site. The existing lawful use would be a material consideration in a planning application.

13. We do not ask the Inspectors to pre-judge a future planning application, however it is not good practice for a policy to set out a position which is likely to be vulnerable to challenge at application stage. No justification has been provided for the arbitrary exclusion of complementary commercial use of the site.
14. We consider the exclusion of uses complementary to academic endeavours, particularly the lawful B1 use presently upon the site, from the policy to be unjustified, and inconsistent with the broader Plan vision and national policy rendering policy SP17 unsound. The site allocation should be expanded to confirm such use is supported upon the site.

Locational restriction on student accommodation- SP17

15. The Centre have previously raised comment on the arbitrary restriction in the policy as initially drafted which limited student accommodation to the northern portion of the allocated site. We are grateful for the Inspectors' attention on this issue and welcome the Council's suggested modification, however it is considered the text of the policy requires further amendment for the sake of complete clarity.
16. Although the second sentence of SP17 in the Submission Draft (which reads: "*Student accommodation should only be located on the half of the site north of Cuckoo Lane*"), has been deleted the heading for the policy is "*Government Buildings and Harcourt House*". Despite the amendment the policy still states "*Planning permission will be granted for residential, student accommodation and academic institutional uses at the Government Buildings site*". For clarity, we consider the sentence should say "*Planning permission will be granted for residential, student accommodation and academic institutional uses at the Government Buildings and Harcourt House site*" to avoid any doubt as to the policy's support in principle for the use across the whole allocated site.

Open space- SP17

17. The submitted policy included a requirement that 10% of the allocated site be provided as open space as a result of development. The Centre notes the Council's explanation in response to the Inspector OCC2, however the policy is struck through in the later schedule of suggested modifications OCC3.

18. The Centre understands the Council now accept the open space requirement cannot be included in the policy if it is to be considered sound. We welcome and endorse this suggested modification and considers it necessary for the reasons set out in our Regulation 19 submission (paragraph 4.50).