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**Oxford City Council's response
to statement from Cushman &
Wakefield on behalf of Unipart
Group regarding SP8**

PSD.13A

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Oxford City Council response to statement from Cushman & Wakefield on behalf of Unipart Group regarding SP8: Unipart (PSD.13)

Introduction

1. The Inspectors have asked the City Council to provide their view about the modification being proposed to policy SP8: Unipart to amend the approach to B8 in the policy. The City Council is minded not to accept the modification being proposed by Cushman and Wakefield on behalf of the Unipart Group as we do not consider it to be necessary for soundness.

The Plan's Approach

2. The Oxford Local Plan's Spatial Strategy set out in Chapter 1 of the Plan states

'Addressing the housing issue is a key priority and this Plan will aim to provide more homes while protecting and enhancing the Oxford's unique historic and natural environment. The Plan seeks to support the growth in the Oxford economy in key sectors linked to its economic strengths and contributing to advancements in learning and innovation locally, nationally and globally.

The focus of new development will be on intensifying development on previously developed land as this is not only best practice but essential in a constrained urban environment like Oxford.'

3. The Plan sets out a balanced approach in planning for the employment needs of the city whilst recognising the need to optimise land for housing. The approach that is proposed in the Plan is one which seeks increased flexibility in managing economic growth and prioritising the uses on sites. The overall approach is to not allocate new land for employment, but to ensure existing employment sites are used in the most efficient way to meet needs.
4. Recognising the need for flexibility, the Plan has adopted a hierarchical approach to employment sites as set out in Policy E1: Employment and explained in more detail in background paper BGP.6: Economy. Category 1 sites are those that are considered most important for retention. Although Category 1 includes B8 there are specific reasons linked to nationally and regionally important employers.
5. We do not consider it a sound approach to have a general B8 allowance on site SP8 that could result in B8 uses that are not linked to the site activities. The evidence base to support the economic policies in the OLP 2036 has been based upon the Employment Land Assessment (ELA) 2018. This study has built upon the 2016 (ELA) and also draws together recent evidence regarding economic and commercial

property market dynamics in Oxford draws upon other commercial information about how the commercial property markets have been performing in the city. This assessment forecast that between 2016-2036 there is a need for 135,000m² of additional employment floorspace. Of that total only 20,350m² is for B2/B8 floorspace compared to 114,650m² projected demand for new B1A/B/C floorspace.

6. The Plan sets out that new proposals for B8 uses are not to be supported unless essential in supporting a Category 1 site. Paragraph 2.10 of the Plan sets out the reasoning as to why B8 uses are not being promoted in the Plan. This is because these uses require large amounts of land usually with a low jobs ratio to land area. Given the limited land available within Oxford, combined with the competing demands on this land and the constrained transport network in the city we consider that allowing B8 uses, which are not connected to existing Category 1 sites, is detrimental to the Plan's strategy and not necessary to make the plan sound.
7. Cushman & Wakefield in their hearing statement (para 4.12) state ***there is no reason that Oxford should be different to other locations around the county, and therefore needs a suitable supply of land for B8 uses'***. However, Oxford is considered to be different owing to its tightly drawn boundary and scarcity of land and therefore the need to priorities the use of land against competing demands. This is detailed in BGP. 7 Efficient use of land and developed in Matter 2 Housing Capacity.
8. It would not be the most efficient use of land to promote additional B8 uses particularly within the ring road. We acknowledge the need for some B8 floorspace to support and complement the Category 1 sites within the city and the policy already allows for that. The relaxation of this approach, by allowing the proposed modification set out in Unipart's hearing statement is considered by the City Council to be unsound as it would run counter to the key premise of the strategy to make the most efficient and effective use of land.