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Planning Policy
Oxford City Council
St Aldate's Chambers
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Oxford
OX1 1DS

To whom it may concern,

Wickes, Botley Road Retail Park - Representations to Oxford Local Plan 2040 Regulation 19 Consultation

These representations, prepared by Quod, respond to the Oxford Local Plan 2040 Regulation 19 consultation document and are submitted on behalf of Sackville UK Property Select III (GP) No.2 Limited ("Sackville UK") who own the Wickes site (situated in Botley Road Retail Park on the southern side of Botley Road).

Representations

Following the Preferred Options Regulation 18 consultation, the Regulation 19 consultation document contains a series of draft policies and sites that are proposed to be allocated in the plan. Our representations to these draft policies and proposed sites are set out below.

Spatial Strategy





Employment Strategy



Botley Road Retail Park

Quod welcomes the site specific support within **Policy SPCW8 (Botley Road Retail Park)** for research led and other economic employment uses within this location.



The policy also states that developers are encouraged to follow a coordinated masterplan approach for the site to encourage holistic development and avoid a situation where proposals coming forward in a piecemeal way. However, as set out later on in the policy, Oxford City Council has prepared the Botley Road Retail Park Development Brief (TAN 17) (published October 2022) and development proposals should have consideration to this Brief.

The Brief states at paragraph 2.2:

“...there is need for some development guidance now for those interested in bringing forward development on this site to ensure any opportunities to enhance the area, despite its constraints, are optimised. In addition, for those developments that do require planning permission opportunities will be sought to seek contributions for public realm enhancements where applicable. Development coming forward on this site needs to consider how it will be undertaken to ensure that it does not preclude or sterilise the wider redevelopment of the retail park and its enhancement.”

Oxford City Council is aware that the Retail Park falls within multiple landownerships, and that applications have already been submitted and approved for the redevelopment of specific sites within the retail park. Therefore, reference to a coordinated masterplan within Policy SPCW8 does not correlate with the current planning position of the Retail Park and does not align with the principles of the Brief. This coordinated masterplan reference should be removed, as several schemes have been already been approved individually.

As noted above, the Brief was prepared to guide development and ensure that development does not preclude or sterilise the wider redevelopment of the retail park and its enhancement. Quod is fully supportive of this approach, and it is proposed paragraph 2 and 3 of **Policy SPCW8** are amended as follows to reflect this:

~~*“Developers are encouraged to follow a coordinated masterplan approach for the site to encourage holistic development and avoid a situation where proposals coming forward in a piecemeal way.”*~~

Development proposals should have consideration for the policy and spatial guidance contained in the Botley Road Retail Park Development Brief (TAN 17). Development coming forward on this site needs to consider how it will be undertaken to ensure that it does not preclude or sterilise the wider redevelopment of the retail park and its enhancement.”

Flood Risk

Policy G7 (Flood Risk and Flood Risk Assessments) is generally against development in Flood Zone 3b unless it is for water-compatible development or on previously developed land with appropriate mitigation. Part (j) of this policy states that development should *“not lead to a net increase*





“Planning permission will not be granted for development that will not retain the ~~special significance~~ important characteristics of views of the historic skyline, both from within Oxford and from outside...

... Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the ~~special significance~~ important characteristics of the view.”

This wording follows the guidance set out within the “Guidelines for Landscape and Visual Impact Assessments” 3rd Edition.

Embodied Carbon in the Construction Process

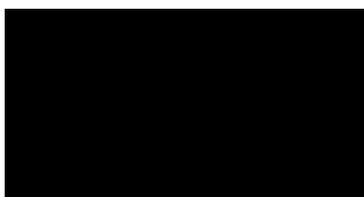
Quod is supportive of the principle of **Policy R2 (Embodied Carbon in the Construction Process)** which states that developments are expected to demonstrate consideration of embodied carbon in the construction process and take actions to limit this as much as possible through careful design choices.

Part a) of the policy states that the re-use of any existing building on a site should be explored and demonstrated to be unfeasible before resorting to demolition. However, in some scenarios it may be feasible to retain the building but the building may not be suited to the requirements for the site. For example, Oxford is seeking to intensify existing employment sites and there may be an existing building on a site that would not be suitable for the proposed employment use and would not result in making the best and most efficient use of brownfield land. It is therefore proposed that the following wording in green is added to part a):

“Re-use of any existing buildings on a site has been robustly explored and demonstrated to be unfeasible, or not suited to the requirements for the site, before resorting to demolition”

Should you require any further information on the above, please do not hesitate to contact me or my colleague Alex MacGregor [REDACTED].

Yours sincerely



James Guthrie
Director