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Planning Policy
Oxford City Council
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To whom it may concern,

234 Botley Road - 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 234 Botley Road (situated on the northern 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

Quod welcomes the proposed approach of achieving sustainable growth, with facilities and development clustered in centres, accessible by public transport, walking and cycling, as set out in **Policy S1 (Spatial Strategy and Presumption in Favour of Sustainable Development)**.

Part (d) of Policy S1 seeks to ensure that development is located to *"focus new employment development that supports Oxford's national and international role in research and development on existing sites already in that use"*. It is recommended that the policy is reworded to state:

"d. focus new employment development that supports Oxford's national and international role in research and development on existing ~~sites already in that use~~ employment sites."

This revised wording will allow an appropriate level of flexibility and will not preclude research and development ("R&D") from coming forward on other employment sites which may be appropriate for R&D use to meet the current demand.

Employment Strategy

Quod supports **Policy E1 (Employment Strategy)** which recognises the demand for research and development lab spaces. The policy sets out clear support for the intensification and modernisation of

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Category 1 and 2 employment sites. The policy also prevents a net loss of employment floorspace on Category 1 and 2 employment sites and focuses new employment generating uses on these sites only. The site, 234 Botley Road, is categorised as a Category 2 employment site, which is reflected in Appendix 3.2 of the Regulation 19 consultation document and on the policies map.

This approach to Category 1 and 2 employment sites is fully supported as it strengthens the role of Category 2 employment sites compared to adopted Policy E1, which only seeks to prevent the loss of Category 2 employment floorspace.

The first paragraph of the policy states that new development on employment sites needs to show that it is making the best and most efficient use of the land, however, it is recommended that the below editions in green is made so it aligns with the fifth paragraph of the policy.

“All new development on employment sites needs to show that it is making the best and most efficient use of land and premises and positively promotes sustainable development either through the upgrading and re-use of existing buildings, or the redevelopment of the site, and does not cause unacceptable environmental impacts.”

Paragraph 3.7 of the sub-text sets out the importance of employment floorspace, particularly for research and development uses. It states:

“The demand for employment space in Oxford has remained high despite changes to working practices that have emerged since the pandemic (e.g. increased hybrid and home working for office-based workers). This strong demand for employment floorspace in the city exists because many of Oxford’s key employment sectors are those where home working is not possible or very difficult (e.g. research and development and manufacturing).”

This recognition of the importance of research and development space to Oxford’s economy, and that there is significant demand for this space, is welcomed and is a correct reflection of the market within Oxford. It is widely viewed that one of the biggest barriers to growth within Oxford is the lack of suitable space for research and development and lab uses, and it is of utmost importance that barriers to entry at suitable locations are reduced. This is reflected in the Oxford Employment Land Needs Update Report (2023), which calculates a need for 296,000sqm-348,000sqm of employment floorspace, of which a high proportion of this need is attributed to research and development.

Draft Policies Map – Employment Sites

Appendix 3.2 of the Regulation 19 Local Plan identifies 234 Botley Road as a Category 2 employment site and these sites are also identified on the draft policies map as shown in Figure 1 below.



Figure 1: Extract of Regulation 19 Policies Map (employment sites shown in orange)



...is the best and most efficient use of land, in line with...
...at the policies map highlights the whole site so that it is clear that the...
...Category 2 Employment Site. The proposed amended boundary is...





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 in the built footprint of the existing building within Flood Zone 3b and where possible lead to a decrease.*” Quod would propose the following alternative wording for this section:

“All the following criteria must also be met:

j) it will not lead to a net increase in the built footprint of the existing building within Flood Zone 3b and where possible lead to a decrease where it would result in an increased risk of flooding”

The current proposed wording of this policy prevents any net increase in built development within these areas, where robust mitigation strategies and sensitive design solutions could prevent any further increase of flood risk on schemes which may exceed the existing building footprint. The alternative wording is proposed to allow for some flexibility on schemes which may propose a slight increase in built footprint in Flood Zone 3b if supported by suitable mitigation measures, ensuring that the risk of flooding is not increased as a result.

In addition, the Oxford Local Plan 2040 Policies Map continues to designate the existing building and the wider 234 Botley Road site as different Flood Zones. Quod suggests that the flood designations should be consistent across the site rather than separating the building.

Heritage

Policy HD1 (Conservation Areas) states that “*planning permission will be granted for development that responds positively to a conservation area’s significance, character and distinctiveness*”. This wording is particularly onerous and does not align with the wording within the National Planning Policy Framework (“NPPF”) which states that there is a ‘desirability’ for new development to sustain and enhance heritage assets. As such, the following alternative wording is proposed:

“Planning permission will be granted for development that ~~responds positively to~~ preserves and, where possible, enhances a conservation area’s significance, character and distinctiveness.”

Similarly, draft **Policy HD2 (Listed Buildings)** states that “*planning permission will be granted for development that responds positively to a listed building’s significance, character and distinctiveness*”. Again, this wording does not align with the NPPF. It is proposed the following amendment is made:

“Planning permission will be granted for development that ~~responds positively to~~ preserves and, where possible, enhances a listed building’s significance, character and distinctiveness.”

The wording of draft **Policy HD6 (Non-designated Heritage Assets)** references “Local Heritage Assets” which is a confusing term that does not clearly distinguish between non designated heritage



assets and designated heritage assets. This draft policy needs to be supported by a clear definition of the term 'Local Heritage Asset'.

Policy HD9 (Views and Building Heights) does not clarify that a view is not a heritage asset and does not carry the same significance as a heritage asset does. As such, the following alternative wording for the first and sixth paragraphs is proposed:

“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

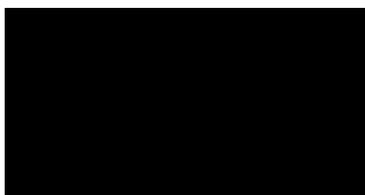
Quod is supportive of the principle of **Policy R2 (Embodied Carbon in the Construction Process)** which states that developments are expected to demonstrate consideration of embodied carbon in the construction process and take actions to limit this as much as possible through careful design choices.

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