

Sarah Harrison Team Leader Planning Policy Planning and Regulatory Services Oxford City Council Town Hall St Aldates Oxford OX1 1BX

## **BY E-MAIL ONLY**

Dear Sarah,

# OXFORD LOCAL PLAN 2040 - FIRST DRAFT CONSULTATION / CALL FOR SITES ON BEHALF OF OXFORD HEALTH NHS FOUNDATION TRUST

On behalf of our client, Oxford Health NHS Foundation Trust (herein 'The Trust') we write with reference to the Oxford Local Plan 2040 first draft consultation and the Call for Sites exercise.

Following our meeting on 6<sup>th</sup> December 2023, you have kindly agreed to our representations being submitted by 16<sup>th</sup> January 2024 to allow time for sign-off by the Trust's Investment Committee. This has now been secured, and the Trust's final representations are therefore now attached.

## ABOUT THE OXFORD HEALTH NHS FOUNDATION TRUST

Oxford Health NHS Foundation Trust is an NHS foundation trust that provides physical, mental health and social care for people of all ages across Oxfordshire, Buckinghamshire, Swindon, Wiltshire, Bath and North East Somerset. Its services are delivered at community bases, hospitals, clinics and in people's homes.

The Oxford Health NHS Foundation Trust's aim is to improve the health and wellbeing of its patients and families. It works in partnership with a range of organisations including:

- The University of Oxford to promote innovation in healthcare, support research and to train doctors and psychologists;
- Oxford Brookes University and the University of Bedfordshire to train nurses and allied health professionals;
- Local authorities and voluntary organisations;
- GPs across all the locations served by the Trust in order to provide integrated care.



With over 5,000 sqm of floor space located across 35 unique, mostly ageing sites in the city, the Trust's estate is large, inefficient and in urgent need of transformation. It has expanded to reflect the diverse nature of the organisation it serves with its core infrastructure located at The Warneford Hospital (mental health), The Fulbrook Centre (City Community Hospital) and Littlemore Mental Health Centre (mental health, forensics and the Trust's HQ). In addition, there is a significant number of flexible, more specialist assets such as Luther Street Medical Centre (homeless GP service), St. Barnabas Clinic (podiatry) and The Slade Hospital adult and children's mental health dispersed across the whole city along with a large, transient grouping of buildings typically used by community teams and the Trust's talking therapy services on a more ad-hoc basis.

The nature of the Trust's dispersed estate is largely the product of organic / ad-hoc growth, much of which has taken place in the last 10-15 years following legislative changes (brought about mainly by the Health and Social Care Act 2012) which resulted in former Primary Care Trust properties being transferred to the Foundation Trust (examples include The Fulbrook Centre, South Parade Health Clinic and Cornwallis House) or contractual changes as in the case of the Learning Disabilities Service which was novated to the Trust from Southern Health in 2015 along with the freehold interest in The Slade Hospital.

To better understand its estate, the Trust is preparing an overarching strategic document (2024 – 2025) that includes a detailed assessment of the suitability of every asset (freehold and leased sites) in the city and the immediate surrounding areas against a range of criteria. This document will enable the Trust to focus limited resources on its core estate and to identify opportunities for redevelopment to meet rapidly evolving healthcare needs.

The Trust has particular ambitions for its assets at Manzil Way Resource Centre, Slade House, Rectory Centre and Littlemore Mental Health Centre. Background profiles for each are set out at **Appendices 1** (a) to (d) where we also discuss the context for each of the Local Plan representations.

## THE TRUST'S REPRESENTATIONS

The site-specific representations themselves are set out in the comment forms at **Appendix 2**:

- Manzil Way Resource Centre (Policy SPE13);
- Slade House (Policy SPE14);
- Rectory Centre (Policy SPE21);

Comment forms have also been prepared in respect of the following generic policies:

- Policy H5: Employer-linked affordable housing;
- Policy H6: Mix of Dwelling Sizes (number of bedrooms);
- Policy H8 (Houses in Multiple Occupation);

## CALL FOR SITES: LITTLEMORE MENTAL HEALTH CENTRE, SANDFORD ROAD

We also note the Council's concurrent Call for Sites exercise, and in this context we would like to present the potential offered by Littlemore Mental Health Centre. This is summarised at **Appendix 1(d)**, whilst a site location and site plan are included within **Appendix 3**.



## LOCAL PLAN 2036

Some sites are already allocated within the Local Plan 2036 and for convenience a comparison of the old and new policy wording is included within the table within **Appendix 4**.

## CONCLUSIONS / NEXT STEPS

We are pleased to have the opportunity to comment on behalf of the Trust in relation to the first draft consultation Oxford Local Plan 2040, and the Call for Sites.

We would appreciate being kept informed as the emerging Local Plan 2040 progresses and would also welcome a further meeting with you and your colleagues to discuss the details of this submission and the strategic opportunity it represents.

If you have any further questions in the meantime though, please do not hesitate to get in contact.

Yours sincerely,



## Arron Twamley MRTPI Arc Planning Associates Director

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## Appendix 1 - Site Specific Profiles / Context for Representations

- (a) Manzil Way Resource Centre
- (b) Slade House
- (c) Rectory Centre
- (d) Littlemore Mental Health Centre

## **Appendix 2 - Completed Comment Forms**

- Manzil Way Resource Centre (Policy SPE13);
- Slade House (Policy SPE14);
- Rectory Centre (Policy SPE21);
- Policy H5: Employer-linked affordable housing;
- Policy H6: Mix of Dwelling Sizes (number of bedrooms);
- Policy H8 (Houses in Multiple Occupation);

#### Appendix 3 - Littlemore Mental Health Centre Site Location Plan

#### Appendix 4 - Local Plan Policy Table

CC Wayne Heal, Oxford Health NHS Foundation Trust

Nigel Hawkey, Arc Planning Associates

APPENDIX 1 (a) to (d) SITE SPECIFIC PROFILES / CONTEXT FOR REPRESENTATIONS

## (a) MANZIL WAY RESOURCE CENTRE, COWLEY ROAD

#### The Site

Manzil Way Resource Centre is located within Cowley Road District Centre. The site, extending to approximately 0.75 hectares, is owned by Oxford City Council but leased to the Trust on a long-term lease. The current building is single storey and has come to the end of its economic life and requires redevelopment. The site lies adjacent to Manzil Gardens public open space, health centre, Mosque and Asian Culture Centre.

It is used for health care, offices and residential uses, and comprises the following services: Talking Space, Complex Needs Service and Isis Centre, Older Adults and Mind Service, and Restore Garden café. There is a car park for approximately 30 vehicles. There is also a residential flat within the site but is not used because it is no longer considered fit for purpose.

#### Local Plan 2040 Proposals as they affect the site

According to the draft Sites and Policies Map it is subject to the following policies:

- East Infrastructure Area
- SPE13 (Manzil Way Resource Centre)
- HD9 (View Cones)
- C2 District Centre

**East Infrastructure Area** comprises a range of uses including education, residential, research and the hospitals. As a result of people needing to get to the sites, particularly the hospitals, there is significant traffic congestion in the area. Improving accessibility, especially to the hospitals, by means other than the car is a key aim for the area. The area also includes many significant green spaces, including the Lye Valley SSSI, South Park and Bury Knowle Park.

**Policy SPE13 (Manzil Way Resource Centre)** is allocated for improved health care facilities, associated administration, and/or residential including employer linked affordable housing. Other complementary uses will be considered on their merits.

The policy highlights the following site constraint and opportunities:

- **Open Space, Nature and Flood Risk** development proposals should include urban greening and opportunities to introduce new tree and shrub planting;
- Urban Design and Heritage development proposals should respond to opportunities of the adjoining Manzil Gardens including enhancements to become a high-quality spine by which community focused buildings are accessed. Impact to protect the Oxford view cone should also be considered;
- Movement and Access access continued from Manzil Way, including consideration of pedestrian and cycle use/conflicts. This includes demonstrating how the development enables access by alternative means of transport including improving connectivity such as walking and cycling.
- **Nature and Resources** development proposals to investigate / mediate against contamination.

**HD9 (Views and Building Heights)** seeks to protect the special significance of views of the historic skyline, both within and outside Oxford. Proposals that are above the prevailing heights of the area and that could impact on character should be fully explained by reference to various criteria. Any proposals within the View Cones (and in this case the Crescent Road View Cone) that may impact on the foreground of views and roofscape should be designed carefully.

**C2 (Maintaining Vibrant Centres – District Centre)** seeks the densification and growth of the district centres. Planning permission will be granted for new development where it improves permeability and connectivity, delivers intensification of development to create high-density centres and more residential development, including on the upper floors of existing commercial premises. It also requires the creation of active frontages, rationalisation of car parking, public realm

improvements, improved pedestrian connections, and enhancement and new opportunities for public realm and landscaping.

#### Our Comments

- We support the allocation of the site for improved health care facilities, associated administration, and/or residential including employer linked affordable housing.
- We support the inclusion of the following sentence: 'Other complementary uses will be considered on their merits'.
- However, we would like to see the uses broadened to include:
  - extra care accommodation;
  - student accommodation;
  - employment uses; and,
  - academic institutional and education uses.
- The site represents a good opportunity to redevelop a previously developed site within a highly sustainable location along the Cowley Road. We consider density and building heights can be maximised whilst safeguarding and improving the environment, as well as ensuring safe and healthy living conditions of future occupants. We consider the site can deliver a well-designed place which will function well and add to the overall quality of the area over the lifetime of the development.
- We support the incorporation of urban greening (including new tree and shrub planting) as part of the development proposals for the site, but this should only be provided where it does not prejudice site layout and design, as well as affect site viability.
- We support the need for high quality design. We consider the site can be developed to
  provide high-quality urban design where the siting, massing and design creates an
  appropriate visual relationship with the built form of the local area as well as the adjoining
  Manzil Gardens.
- The site can provide a mixed-use development that is aligned to meeting the economic, social and environmental needs of the city, as well as provide a wide range of uses.
- The redevelopment of the site should not be restricted to the existing building height. We consider there is scope to increase building height to match surrounding building heights along the Cowley Road. We do however recognise the proposed height of the buildings should respect the view cone from Crescent Road.
- We support the need for sustainable and accessible design. On the basis that the site benefits from a wide range of amenities and public transport connections, we consider it is in a highly sustainable location for new development. Measures to improve walking and cycling are also supported.
- We support the need for technical assessment as part of any planning application, including the submission of contamination, noise and air quality surveys.
- We consider the draft Sites and Policies Map posted on the Consultation website is not fit for purpose; it is low resolution and consequently the image is blurred and in some cases the lines overlap which make the map difficult to interpret.

## (b) SLADE HOUSE, THE SLADE, HEADINGTON

#### The Site

Slade House comprises a mix of offices, training and is a base the trust's children's service. The site comprises Slade House, Abell House and Maple House. It extends to approximately 1.68 hectares and the freehold is owned by the Trust.

The site lies in close proximity to the Shotover and Brasenose Wood SSSI. It is also in the vicinity of the Lye Valley SSSI, which contains peat deposits and is sensitive to impacts to groundwater flows and other changes to hydrology.

A Tree Preservation Order also applies across the whole site.

#### Local Plan 2040 Proposals as they affect the site

According to the Oxford Local Plan 2040 Sites and Policies Map the site is subject to the following policies:

- East Infrastructure Area
- SPE14 (Slade House)

East Infrastructure Area - See above.

**Policy SPE14 (Slade House)** is allocated for improved health care facilities, associated administration, and/or residential including employer linked affordable housing. Other complementary uses will be considered on their merits.

The policy highlights the following site constraint and opportunities:

- Open Space, Nature and Flood Risk development proposals should include the protection of existing green infrastructure features and enhancement of greening on site through the urban greening factor. On site biodiversity enhancement and new Green Infrastructure features and enhancements of existing features is also required. Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI. Development should reduce surface water runoff. Planning permission will only be granted if it can be demonstrated if it can be demonstrated that there would be no adverse impact on the integrity of Brasenose and Shotover Park SSSI. Development proposals must be accompanied by an assessment of potential recreational pressure on the SSSI that may arise from increased numbers of visitors, along with plans to mitigate this impact. Proposals must incorporate green features to meet the minimum targets set out in Policy G3. A Tree Protection Order applies across the whole site, and the design of any redevelopment should be led by the presence of the trees on the site.
- Movement and Access active travel should be promoted and opportunities taken to improve connectivity both to and through the site for pedestrian and cyclists.
- Natural Resources the site is in an air quality 'hot spot' area; development must mitigate against poor air quality during the construction and operational phases. Development will be required to include an appropriate site contamination investigation. Due to the site's proximity to recorded peat reserves associated with the Lye Valley, development on undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of peat deposits. Development proposals must include an acoustic design statement owing to noise from the Oxford ring road/Eastern Bypass.

#### **Our Comments**

- We support the allocation of the site for improved health care facilities, associated administration, and/or residential including employer linked affordable housing.
- We support the inclusion of the following sentence: 'Other complementary uses will be considered on their merits'.
- However, we would like to see the uses broadened to include:

- extra care accommodation;
- student accommodation;
- employment uses; and,
- academic institutional and education uses.
- The site represents a good opportunity to redevelop a previously developed site within a highly sustainable location. We consider density and building heights can be maximised whilst safeguarding and improving the environment, as well as ensuring safe and healthy living conditions of future occupants. We consider the site can deliver a well-designed place which will function well and add to the overall quality of the area over the lifetime of the development.
- We support the need for high quality design. We consider the site can be developed to provide high-quality urban design where the siting, massing and design creates an appropriate visual relationship with the built form of the local area.
- A mixed-use development can be provided which is aligned to meeting the economic, social and environmental needs of the city, as well as provide a wide range of land uses.
- We support the protection and enhancement of green infrastructure features, including the protection of existing trees, but this should only be provided where it does not prejudice site layout and design, as well as affect the financial viability of development.
- We support the requirement to provide biodiversity mitigation and net gain.
- We support the need to protect surface and groundwater flow to the Lye Valley SSSI, as well
  as minimising surface water runoff. In addition, development should not have adverse
  impacts on the integrity of Brasenose and Shotover Park SSSI
- We support the need to demonstrate that development will not lead to the harm or loss of peat reserves associated with Lye Valley.
- We support the need for sustainable and accessible design, and the need for applications to be accompanied by a Transport Statement and Green Travel Plan. On the basis the site benefits from a wide range of amenities and public transport connections, we consider a housing scheme can be delivered as a car free development.
- We support the need for technical assessment as part of any planning application, including the submission of contamination, noise and air quality surveys.
- We consider the draft Sites and Policies Map posted on the Consultation website is not fit for purpose; it is low resolution and consequently the image is blurred and in some cases the lines overlap which make the map difficult to interpret.

## (c) RECTORY CENTRE, RECTORY ROAD, COWLEY

#### The Site

The Rectory Centre is used by the NHS as a family planning centre alongside a drug and alcohol service. The site comprises a cluster of buildings and car parking, and extends to 0.21 hectares .

The freehold is owned by the Trust.

#### Local Plan 2040 Proposals as they affect the site

The Rectory Centre is allocated for residential development (with a minimum of 21 new homes) under policy **SPE21 (Rectory Centre)**. The policy states development of this site is on the basis there will be no loss of community healthcare facilities and its re-provision elsewhere through consolidation onto other healthcare site (this is in accordance with Local Plan policy C3).

The policy highlights the following site constraint and opportunities:

- **Open Space, Nature and Flood Risk** encourages the use of green walls and roofs within development proposals, as well as greening features as part of gardens and site boundaries.
- Urban Design and Heritage encourages high quality design. Proposals must be designed with consideration of their impact on views particularly from the Crescent Road View Cone. Development must respond to the character of the East Oxford Victorian Suburb and the vibrant Cowley Road District Centre. The existing streetscape of Rectory Road should be considered to enhance the area's existing colour and pattern of brickwork. <u>The existing building height should be respected and adhered to</u>. [our emphasis]
- Movement and Access the site is only accessible via Rectory Road from the west. Proposals should demonstrate how the development improves connectivity to support active travel such as walking and cycling.
- **Natural Resources** the site has potential for contamination; therefore, site investigation will be required. It is located in an air quality 'hot spot' area; development must mitigate against poor air quality during the construction and operational phases.

The Rectory Centre is not shown on the Local Plan 2040 Proposals Map, but it is subject to the following policies:

- East Infrastructure Area
- HD9 (View Cones)
- C2 District Centre

It is noted this is a new allocation (having not been previously included within the Local Plan 2036).

East Infrastructure Area - see above.

HD9 (Views and Building Heights) - see above.

**C2 (Maintaining Vibrant Centres - District Centre)** - See above. It is unclear from the policies map if the site lies within the district centre and therefore some clarification is required.

## Our Comments

- We support the allocation of the site for residential development; however, we do not want this to be predicated on the reprovision of services / new floorspace elsewhere within the city (as part of a linked planning permission for example) as this could delay re-development and eventual sale of the site to a developer or Register Provider. The Trust has a statutory obligation to provide healthcare and it should not be for the planning system, or indeed to the development plan, to enforce this.
- Although the Trust's preference is to allocate the site for housing, to provide complete flexibility we would like the policy broadened to include the following uses:

- employer linked affordable housing;
- extra care accommodation;
- student accommodation;
- employment uses;
- academic institutional and education uses.
- We would also like the inclusion of the following sentence: 'Other complementary uses will be considered on their merits'.
- We support the redevelopment of the site with a minimum of 21 new homes. We consider the intensification of development on site will help to support a high-density district centre and will help to maintain the locality's vitality and viability. The site represents a good opportunity to redevelop a previously developed site within a highly sustainable location. We consider density can be maximised whilst safeguarding and improving the environment, as well as ensuring safe and healthy living conditions of future occupants. We consider a welldesigned place will function well and add to the overall quality of the area over the lifetime of the development.
- The site can provide a mixed development of much needed new homes, that are aligned to meeting the housing needs of the city and a diverse range of households within the city.
- We support the provision of the green features within the development site, but this should only be provided where it does not prejudice site layout and design, as well as site viability. From experience the provision of green walls and roofs are costly to deliver and to maintain. If the site is developed by a Registered Provider it is very unlikely they will want to deliver these as part of the proposals for the reasons stated.
- We support the need for high quality design at the site. We consider the site can be developed to provide high-quality urban design where the siting, massing and design creates an appropriate visual relationship with the built form of the local area.
- We do not consider the redevelopment of the site should be restricted to the existing building height. We consider there is scope to increase building height to match surrounding building heights along the Cowley Road. We do however recognise the proposed height of the building should respect the view from Crescent Road View Cone and this would need to be assessed as part of any development proposals.
- We support the need for sustainable and accessible design, and the need for a Transport Statement and Green Travel Plan with any development proposals. The site is located near Cowley Road with its wide range of amenities and public transport connections and high demand for housing. We therefore consider the site can be delivered as a car free development with new bicycle parking provision being integrated as part of the proposals.
- We support the need for technical assessment as part of any planning application, including a contamination survey, noise and air quality surveys.
- We support a requirement for development to provide biodiversity mitigation and net gain.
- We would like to see the site shown on the Local Plan 2040 Proposals Map; it is not currently shown.
- It is unclear from the policies map if the site lies within the district centre and therefore some clarification is required.
- We consider the draft Sites and Policies Map posted on the Consultation website is not fit for purpose; it is low resolution and consequently the image is blurred and in some cases the lines overlap which make the map difficult to interpret.

## (d) LITTLEMORE MENTAL HEALTH CENTRE, SANDFORD ROAD

#### The Site

This site, extending to approximately 6.6 hectares, provides specialist care for people experiencing a range of acute mental health difficulties. It also includes a psychiatric care unit and forensic mental health services. It is also used by the Trust as its headquarters.

It comprises a mix of buildings/services including Thames House, Corporate Services, Welfare Department, Human Resources, Physiotherapy Department, Lamborn House, The White Building and Porters Lodge.

The adult inpatient wards include: Ashurst Psychiatric Intensive Care Unit, Phoenix Ward, Kennet Ward, Glyme Ward, Wenric Ward, Lamborn House, Kingfisher Ward and Kestrel Ward.

There are no listed buildings on site, although the former Littlemore Hospital site located opposite is grade II listed.

The site is located within Flood Zone 1.

The freehold of the site is owned by the Trust.

A site location plan and site plan are enclosed within **Appendix 3**.

#### Local Plan 2040 Proposals as they affect the site

According to the Oxford Local Plan 2040 Sites and Policies Map the site is subject to the following policies:

• South Infrastructure Area (including Cowley Branch Line and Littlemore Area of Focus

**South Infrastructure Area** comprises the Cowley Road District Centre, Cowley, Temple Cowley, Iffley Fields, Iffley, New Hinksey, Rose Hill, Littlemore, Blackbird Leys and Greater Leys. It includes the area around Kassam Stadium, and MINI Plant Oxford, ARC Oxford and Oxford Science Park.

The Cowley Branch Line and Littlemore Area of Focus seeks to improve and enhance connectivity by modes other than by private car. The potential for the re-instatement of passenger trains along the Cowley Branch Line provides additional public transport services to the city centre via Littlemore/Oxford Science Park and Oxford Business Park/Oxford Retail Park.

The site is located outside the Cowley Branch Line and Littlemore Area of Focus and the Oxford City Wildlife Site (Littlemore Brook).

The site itself is not allocated.

#### Reasoning/Justification for the Proposed Allocation

The Trust considers Littlemore Mental Health Centre has potential for additional healthcare facilities and related uses, within any of the following categories:

- extra care accommodation;
- residential development, including employer-linked affordable housing and student accommodation;
- employment uses that have an operational link to the hospital;
- additional academic institutional and education uses subject to compliance with relevant local plan policies; and,
- other complementary uses on their merits.

We therefore suggest that an additional allocation is included in the Local Plan 2040, with draft principal wording as follows:

#### SPS19 (site reference number to be determined): Littlemore Mental Health Centre

Planning permission will be granted for healthcare facilities and related uses at Littlemore Mental Health Centre, any of the following complementary uses:

- extra care accommodation;
- residential development, including employer-linked affordable housing and student accommodation;
- employment uses that have an operational link to the hospital;
- additional academic institutional and education uses subject to compliance with relevant local plan policies; and
- Other complementary uses will be considered on their merits.

We are content for the policy to refer to additional safeguards, as follows:

In relation to open space, nature and flood risk, we would support the protection by the policy of existing green infrastructure features on site (including trees and hedges), as well as on site bio diversity enhancements where required. We support opportunities for new tree planting and new landscaping schemes as part of any redevelopment proposals.

In relation to urban design and heritage, we would support high quality design and would be willing to follow a coordinated masterplan approach for the site to encourage holistic development and avoid piecemeal proposals. We support the need to improve place-making and to improve the external appearance of the site from Sandford Road.

Redevelopment of the site should not be restricted to the existing building height. We consider there is scope to increase building height but recognise that development proposals that exceed the height identified the City Council's 'High Buildings' Technical Advice Note (TAN) may have an impact on the historic core (the TAN states that impacts upon the skyline may be possible from 21m and above) We acknowledge that the landscape and visual impacts of any higher buildings need to be fully assessed.

We also recognise that development proposals must take into consideration the impact on the setting of the grade II listed old Littlemore Hospital site, as well as any archaeological impacts since there are Medieval and Roman archaeological remains within the locality,

In relation to movement and access, the site benefits from a wide range of amenities and public transport connections and is a sustainable location for development. However, for the hospital site to properly function, there is still a need to provide car parking (existing and new spaces) for patients and staff. The Trust therefore cannot currently support polices to reduce car parking. The site will benefit from the re-opening of the Cowley Branch Line to passengers; therefore, opportunities can be taken through the development of this site to improve the modal split in favour of public transport and cycling / walking. Measures to improve pedestrian and cycle links will therefore also be supported.

In relation to natural resources, owing to the site proximity to recorded peat reserves along Littlemore Brook and the potential for further deposits within the area, the layout and design of proposals would be designed to protect and mitigate any harm.

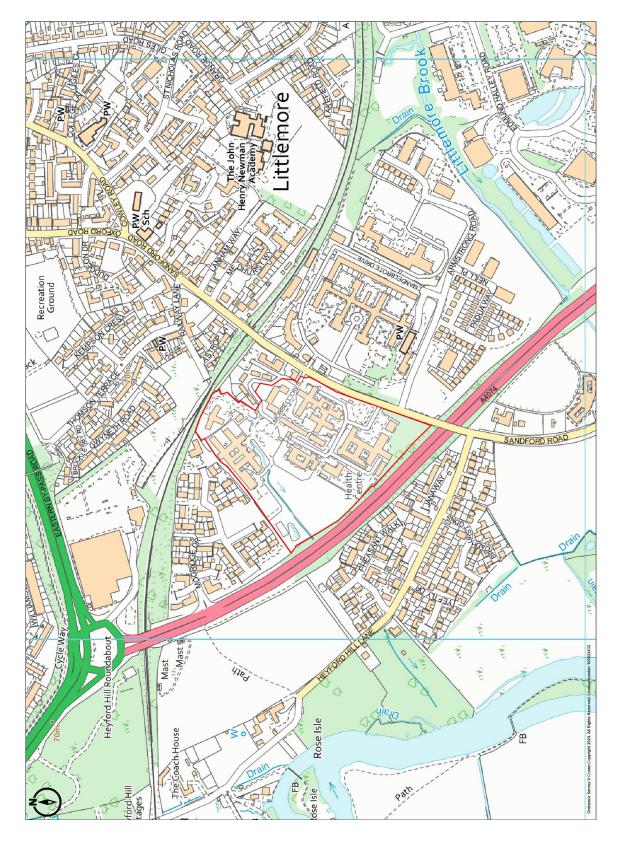
The Trust supports the provision of technical information to support any development proposals, including contamination investigation and acoustic noise assessment (the site is located within an area which is subject to environmental noise from traffic using surround roads).

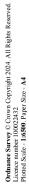
We would not support a requirement for the reprovision of health care services / new floorspace elsewhere within the city (as part of a linked planning permission for example) as this could delay redevelopment of the site and a future sale. The Trust has a statutory obligation to provide healthcare to residents and it should not be for the planning system, or indeed to the development plan, to enforce this.

Appendix 2 - Completed Comment Forms

See Part B Forms

Appendix 3 - Littlemore Mental Health Centre Site Location Plan







Appendix 4 - Local Plan Policy Table

## OXFORD HEALTH NHS FOUNDATION TRUST - ALLOCATED SITES POLICY TABLE

CHANGES HIGHLIGHTED IN RED

Site	Adopted Local Plan 2036	Local Plan 2040 Submission Draft
Manzil Way Resource Centre	Policy SP46	Policy SPE13
	Planning permission will be granted for improved health-care facilities, associated administration and/or residential development, including employer-linked affordable housing, at the Manzil Way Resource Centre site. Other complementary uses will be considered on their merits.	<ul> <li>Planning permission will be granted for improved health care facilities, associated administration and/or residential development, including employer-linked affordable housing, at the Manzil Way Resource Centre site.</li> <li>Other complementary uses will be considered on their merits.</li> <li>Open space, nature and flood risk</li> </ul>
		Development proposals should include urban greening on the site and opportunities to introduce more tree and shrub planting.
		Urban design and heritage
		Development should respond to the opportunities of the adjoining Manzil Gardens public open space, and support enhancements to Manzil Way to become a high-quality spine from which numerous community-focussed buildings are accessed (the health centre, Mosque and Asian Culture Centre, and the community garden cafe). Development proposals must be designed with consideration of their impacts on the protected view in accordance with Policy HD9.
		Movement and access
		Access should continue to be from Manzil Way. The site is small so circulation around it to allow safe turning for vehicles that does not conflict with pedestrian and cycle use will need careful consideration. Applicants will be expected to

		<ul> <li>demonstrate how the development enables access by alternative means of transport including improving connectivity to support active travel such as walking and cycling.</li> <li>Nature and resources</li> <li>Because of the previous use of the site some potential contamination may be present on the site, so site investigation will be required, and remedial works are likely to be necessary in compliance with Policy R5</li> <li>Other applicable policies according to Local Plan 2040 Sites and Policies Map: <ul> <li>East Infrastructure Area</li> <li>HD9 (View Cones)</li> <li>C2 (District Centre)</li> </ul> </li> </ul>
Slade House	Policy SP57 Planning permission will be granted for improved health-care facilities, associated administration and/or residential development, including employer-linked affordable housing, at the Slade House site. Other complementary uses will be considered on their merits. Planning permission will only be granted if it can be demonstrated that there would be no adverse impact on the integrity of the Brasenose and Shotover Park SSSI. Development proposals should be accompanied by an assessment of groundwater and surface water flows to the SSSI. They must also incorporate sustainable drainage with an acceptable management plan. Development proposals should be accompanied by an assessment of potential recreational pressure on the SSSI that may arise from increased numbers of visitors, along with plans to mitigate this impact as necessary. Development should be designed to ensure that there is no adverse impact on the Lye Valley SSSI. All proposals should minimise impact on air quality during construction phase and after implementation, particularly if they comprise of employment uses	<ul> <li>Policy SPE14</li> <li>Planning permission will be granted at the Slade House site for improved health-care facilities, associated administration, and/or residential development, including employer-linked affordable housing. Other complementary uses will be considered on their merits.</li> <li>Open space, nature and flood risk</li> <li>Policies G1 and G3 require protection of existing green infrastructure features and enhancement of greening on site through the urban greening factor. Policy G5 requires onsite biodiversity enhancement, and Policy G2 requires new Green Infrastructure features and enhancement of existing features. It is expected that those requirements will be met in the following ways. Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI.</li> <li>Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan. Planning permission will only be granted if it it</li> </ul>

can be demonstrated that there would be no adverse impact on the integrity of the Brasenose and Shotover Park SSSI. Development proposals must be accompanied by an assessment of potential recreational pressure on the SSSI that may arise from increased numbers of visitors, along with plans to mitigate this impact as necessary.

Proposals will need to ensure that an appropriate proportion of green features are incorporated into the design of development to meet the minimum targets set out in the Policy G3. A Tree Protection order applies across the whole site, meaning all trees on site must protected in any redevelopment of the site. The design of any redevelopment should be led by the presence of the trees on the site and be prepared in a way that these would be retained.

#### Movement and access

Active travel should be promoted in this site and opportunities taken to improve connectivity both to and through the site for pedestrians and cyclists.

#### Natural resources

The site is in an air quality hot spot area. Development proposals must demonstrate compliance with Policy R4 by ensuring that all necessary mitigation measures against poor air guality have been incorporated during the construction and operational phases and ensuring that any potential negative air quality impacts are adequately mitigated on an ongoing basis, within and surrounding the site. Development proposals will be required to include an appropriate site contamination investigation and applications will be required to demonstrate how any contamination issues will be resolved in compliance with Policy R5. Due to the site's proximity to recorded peat reserves associated with the Lye Valley, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of peat deposits in accordance with the requirements of Policy R6. This may mean that where there is the potential for causing removal of peat, site layout has been designed accordingly to protect and mitigate any harm to identified peat deposits onsite. Development proposals

		<ul> <li>must include an acoustic design statement in compliance with Policy R7 as this site is part of an area which is subject to significant environmental noise from traffic using the Oxford ring road/Eastern bypass.</li> <li>Other applicable policies according to Local Plan 2040 Sites and Policies Map:</li> <li>East Infrastructure Area</li> </ul>
Rectory Centre	N/A	Policy SPE21
		Planning permission will be granted for residential development on this site. The minimum number of residential homes to be delivered is 21. Development of this site would lead to the loss of community healthcare facilities, so these should be re- provided elsewhere, in accordance with Policy C3, which may be through consolidation onto other healthcare sites.
		Open space, nature and flood risk
		Elements of green infrastructure on the site are currently lacking. Although the site is small and constrained the implementation of green walls and roofs on parts of the site should be considered. Further to this, elements of smaller and individual green features as part of gardens, as well as around boundaries, should be implemented to compliment any residential development which will in turn create a more pleasant living environment for residents. Urban design and heritage Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. Development proposals must be designed with consideration of their impact on views, particularly from the Crescent Road view cone, and demonstrate compliance with Policy HD9. Any development should respond to both the character of the of the East Oxford Victorian Suburb and the vibrant Cowley Road District Centre. The existing residential streetscape of Rectory Road should be considered to enhance the area's existing colour and pattern of brickwork. The existing building height should also be respected and adhered to.
		Movement and access

The constrained nature of the site means that the site is only accessible via Rectory Road from the west. The site should be easily navigable for residents both on foot and travelling on a bike, although applicants will be expected to demonstrate how the development improves connectivity to support active travel such as walking and cycling.
Natural resources
The site has potential contamination so a site investigation will be required, and remedial works are likely to be necessary to be undertaken in compliance with Policy R5. The site is located in an air quality hot spot area. Development proposals must demonstrate compliance with Policy R4 by ensuring that all necessary mitigation measures against poor air quality have been incorporated during the construction and operational phases and ensuring that any potential negative air quality impacts are adequately mitigated on an ongoing basis, within and surrounding the site. The site is not included within the Local Plan 2040 Sites and Policies Map