DAVID LOCK ASSOCIATES

STAGE 2 HEARING STATEMENT – MATTER 5 – SITE ALLOCATIONS

OXFORD LOCAL PLAN 2045 EXAMINATION

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1.0 INTRODUCTION

1.1 This hearing statement is submitted by David Lock Associates on behalf of BMW.

1.2 BMW is a leading premium manufacturer of automobiles and motorcycles with more than 30 production and assembly facilities worldwide and a global sales network in more than 140 countries. The BMW MINI Plant Oxford is the main assembly facility for the MINI range of cars, currently producing the MINI 3-door and 5-door Hatch, the MINI Cabrio and the MINI John Cooper Works. The plant is pivotal to BMW's manufacturing activity and network in the UK and remains an important contributor to the local Oxford and wider UK economy.

1.3 This hearing statement focuses on Issue 2 of Matter 5 and responds to following questions only:

- Question 1 of the Cowley Branch Line Area of Focus
- Question 1 of SPS10 – Mini Plant Oxford
- Question 2 of SPS10 – Mini Plant Oxford

2.0 ISSUE 2 – COWLEY BRANCH LINE AREA OF FOCUS

Q1 What is the justification for requiring financial contributions towards public transport enhancements, from trip-generating uses within a 1,500m buffer zone of the proposed Cowley Branch Line stations? How has the zone been established and is it based on appropriate available evidence?

2.1 BMW recognise and support the wider objective of improving sustainable transport opportunities across Oxford and the Cowley area, however the proposed policy does not adequately account for the operational realities of large-scale manufacturing facilities operating on shift patterns.

2.2 BMW MINI Plant operates on early morning, late evening, night-time and rotating shift patterns. A substantial proportion of employees (approximately 80%) are required to arrive at work before conventional public transport services commence operation and leave work after such services have reduced frequency or ceased. In this context, rail travel would not be a realistic or viable mode of transport for many employees.

2.3 The policy would therefore benefit from greater clarity and flexibility to recognise circumstances where public transport infrastructure does not provide proportionate benefit to a particular type of employment use.

2.4 The policy should therefore be amended to allow a proportionate, evidence-based assessment of need and benefit, ensuring that contributions towards the Cowley Branch Line are sought where a genuine and meaningful relationship exists between a proposed development and the use of the Cowley Branch Line. Please refer to BMW's Regulation 19 representation for proposed modifications.

3.0 ISSUE 2 – COWLEY BRANCH LINE AREA OF FOCUS - SPS10 – MINI PLANT OXFORD

Q1 What is the justification for criterion a) which requires "additional greening" to help meet the Urban Greening Factor? How does this take into account the context of the site and its intended uses?

3.1 BMW operate in a highly competitive manufacturing environment through foreign competition, regulatory barriers and structural challenges, with many uncertainties in the market. The need to respond to market changes quickly is an important part of business operation. There is therefore a need to keep areas free from protection/designation to allow flexibility and thus respond to market changes.

3.2 The MINI Plant is a fully functioning manufacturing site which includes an internal road network to allow for vehicles and the BMW supply chain to move around the site. The MINI Plant is also an Authorised Economic Operator and is therefore required to meet a range of access and security measures as a primary operational requirement. These include secure perimeter fencing, adequate lighting, secure access, and the surveillance of loading areas. Therefore, the priority is to protect the operational needs of the site. Making land available for urban greening may make this challenging as part of a new development proposal.

3.3 The MINI Plant is already an intensified site with limited space between existing buildings, and Policy SPS10 already acknowledges that the site is likely to score below the UGF target. In the event of the need to redevelop existing buildings in use at the plant, it will be difficult to achieve urban greening due to the spatial constraints and intensified nature of the site. The former sports field to the east of the plant does provide space, however this is required to provide future expansion land. A test track was developed on the sports field in 2022 and in 2023 planning permission was granted for a lorry park. There are plans for this area under consideration. In the scenario of development on the former sports field the feasibility of achieving the urban greening factor requirement will be even more challenging due to the loss of greenfield land for plant buildings.

3.4 Chapter 6 of the National Planning Policy Framework (2024) is clear that planning policies should help create the conditions for all businesses to invest, adapt and expand. It also says that significant weight should be placed on supporting economic growth and productivity, whilst taking into account local business needs.

3.5 In conclusion, BMW do not disagree with the principle of urban greening, but request that the policy text be modified and that greening '*should be provided unless it is technically unfeasible, impractical or unviable to do so'*, so as not to restrict the future development viability and operational requirements of the MINI Plant.

Q2 Is it sufficiently clear what is required from criterion e), which states that "Whilst there are limited constraints on the site, considerations around heights, scale and massing should factor in how the developments will be viewed from afar…". Is the requirement, justified, clear and effective?

3.6 BMW understand the Council's aims with criterion e). However, the MINI Plant is a manufacturing plant and has been for over 100 years. There are operational requirements and needs that must be prioritised to allow the plant to manufacture cars. This may necessitate a certain height, scale or massing of a building to allow for efficient and effective production.

3.7 As noted in response to Q1 above, the MINI Plant is also an Authorised Economic Operator and is therefore required to meet a range of access and security measures as a primary operational requirement. These include secure perimeter fencing, adequate lighting, secure access, and the surveillance of loading areas.

3.8 In addition, Chapter 6 of the National Planning Policy Framework (2024) is clear that planning policies should help create the conditions for all businesses to invest, adapt and expand.

3.9 Therefore, the proposed modification still stands as per BMW's Regulation 19 representation that the considerations in e) will need to be considered alongside the operational needs of the site.