

Contact Information	
Name	Aya Mohamed
Email	[REDACTED]
Postal Address	[REDACTED] Milton Keynes
Postcode	[REDACTED]
Organisation Name	David Lock Associates (on behalf of BMW)
In what capacity are you responding?	Individual/Member of the public Charity or Community Group Organisation Local Authority Councillor Other
If you are commenting on behalf of someone else, please state their name here.	Paul Waters Plant Development Specialist Plant Oxford & Plant Swindon BMW Group UK (for MINI Plant Oxford)
Data Protection and Notification Options	
Are you happy for the first line of your address and postcode to be published with your response(s)?	No
Do you wish to be notified when: <i>(tick as many)</i>	the Council submits the Oxford Local Plan 2040 to the Government? Yes the Inspector's report is published? Yes the Oxford Local Plan 2040 is adopted? Yes
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Please note: while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.	No, it is not necessary that we participate in examination hearing session(s).
If you wish to participate in the hearing session(s), please tell us why you consider this to be necessary. Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.	N/A
Policy E1 Employment Strategy	
Do you consider that the policy is sound?	No
If not, is it because it is not: <ul style="list-style-type: none"> positively prepared? 	Effective

<ul style="list-style-type: none"> justified? effective? <p>consistent with national policy?</p>	
Do you consider that the policy is legally compliant?	N/a
Do you consider that the policy complies with the duty-to-cooperate?	N/a
<p>Please give details, as precisely as possible, of why you consider that the policy is not legally compliant or is unsound or fails to comply with the duty to co-operate. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.</p>	<p>The policy states: <i>'Planning permission will only be granted for new employment generating uses within Category 1 and 2 employment sites or within the city and district centres.'</i></p> <p>It then later states that: <i>'Proposals for residential development on any category of employment sites will be assessed by a balanced judgement.'</i></p> <p>So the policy contradicts itself. BMW do not require residential development at its MINI Plant but acknowledge that other employment sites may be suitable.</p>
<p>Please set out what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Please note: non-compliance with the duty to co-operate is incapable of modification at examination.</p>	<p>Make clear that planning permission will only be granted for new employment on Category 1 and 2 sites and that any proposals for uses outside of employment, such as residential, will need to be assessed by balanced judgement.</p>
Policy G3 – Urban Greening Factor	
Do you consider that the policy is sound?	No
<p>If not, is it because it is not:</p> <ul style="list-style-type: none"> positively prepared? justified? effective? consistent with national policy? 	Effective
Do you consider that the policy is legally compliant?	N/a
Do you consider that the policy complies with the duty-to-cooperate?	N/a
<p>Please give details, as precisely as possible, of why you consider that the policy is not legally compliant or is unsound or fails to comply with the duty to co-operate.</p>	<p>The requirement to 'green' sites and the tool to measure this is broadly supported. We support the reference to the UGF score not being mandatory for smaller-scale development.</p>

	<p>However, the wording is unclear on the expectations of the policy and therefore not effective. For example there are phrases such as:</p> <p><i>'Applicants are expected to assess'</i> <i>'...proposals should demonstrate'</i> <i>'...will need to be demonstrated'</i></p> <p>The policy should also acknowledge the limitations of brownfield manufacturing sites in providing urban greening and this policy should seek to elaborate on the weight to be given to the UGF score compared to the potential loss of Category 1 employment floorspace – the latter of course is protected under Policy E1.</p>
<p>Please set out what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Improve clarity of policy wording and acknowledge the limitations of brownfield manufacturing sites in providing urban greening.</p>
Policy G5 – Enhancing on-site biodiversity	
<p>Do you consider that the policy is sound?</p>	<p>Yes</p>
<p>If not, is it because it is not:</p> <ul style="list-style-type: none"> • positively prepared? • justified? • effective? • consistent with national policy? 	<p>N/A</p>
<p>Do you consider that the policy is legally compliant?</p>	<p>N/a</p>
<p>Do you consider that the policy complies with the duty-to-cooperate?</p>	<p>N/a</p>
<p>Please give details, as precisely as possible, of why you consider that the policy is not legally compliant or is unsound or fails to comply with the duty to co-operate.</p>	<p>N/A</p>
<p>Please set out what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The requirement to 'green' sites and deliver a mix of ecological enhancements is broadly supported. However, there should be an allowance made to deliver alternative biodiversity solutions and/or to justify reduced provision. This would support design solutions which recognise site-specific conditions (i.e. where it may accommodate one form of habitat-creation over others) and recognise the challenges embedded into the greening of constrained brownfield industrial sites.</p>

Policy R1 – Net Zero Buildings in Operation	
Do you consider that the policy is sound?	No
If not, is it because it is not: <ul style="list-style-type: none"> • positively prepared? • justified? • effective? • consistent with national policy? 	Effective
Do you consider that the policy is legally compliant?	N/a
Do you consider that the policy complies with the duty-to-cooperate?	N/a
Please give details, as precisely as possible, of why you consider that the policy is not legally compliant or is unsound or fails to comply with the duty to co-operate.	<p>BMW is committed to reducing its carbon emissions and meeting relevant sustainability requirements. Sustainability is integrated into BMW's vision and wider business strategy. BMW has developed a bespoke process that incorporates sustainability into all facets of its development and operation processes, including planning, design, decision-making and implementation.</p> <p>The BMW Sustainability Framework is tailored to its operation and project needs; it covers a range of topics and aligns with the categories and credits required under BREEAM UK. In this, we believe Policy R1 and its Energy Use Intensity (EUI) figure could be expanded upon to create some equivalency to BREEAM UK and/or other standardised measurements of development sustainability.</p>
Please set out what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Consider how the policy can align with other standardised measurements of sustainability that are widely adopted in the industry.
Policy HD9 – Views and Building Heights	
Do you consider that the policy is sound?	Yes
If not, is it because it is not: <ul style="list-style-type: none"> • positively prepared? • justified? • effective? • consistent with national policy? 	N/A
Do you consider that the policy is legally compliant?	N/a

Do you consider that the policy complies with the duty-to-cooperate?	N/a
Please give details, as precisely as possible, of why you consider that the policy is not legally compliant or is unsound or fails to comply with the duty to co-operate.	<p>BMW broadly support this policy but request that clarification is included on whether the 15m height limit is Oxford-wide or within a certain buffer of the Carfax Tower. An illustrated plan would be helpful to be included in this policy's supporting text.</p> <p>Further, it is unclear from the Local Plan's supporting evidence base and Background Papers where the 15m figure was derived from – this should be clarified and justified?</p>
Please set out what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Provide justification for the 15m figure.
Policy CBLLAOF	
Do you consider that the policy is sound?	No
<p>If not, is it because it is not:</p> <ul style="list-style-type: none"> • positively prepared? • justified? • effective? <p>consistent with national policy?</p>	Effective
Do you consider that the policy is legally compliant?	N/a
Do you consider that the policy complies with the duty-to-cooperate?	N/a
Please give details, as precisely as possible, of why you consider that the policy is not legally compliant or is unsound or fails to comply with the duty to co-operate. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.	<p>It is unclear from the policy wording whether the contributions towards the Cowley Branch Line will be additional to those derived from CIL, and what constitutes "trip-generating development".</p> <p>The MINI Plant is almost completely within the 1500m buffer of the proposed station but due to the off-peak shift arrangements, and that many employees live far from the MINI Plant due to the lack of supply and cost of local housing, employees are highly unlikely to use or rely on the Cowley Branch Line as alternative means of transport.</p>
Please set out what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally	<p>Provide clarity on what constitutes trip-generating uses.</p> <p>Acknowledge that the MINI Plant will not support the viability of the Cowley Branch Line</p>

compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Please note: non-compliance with the duty to co-operate is incapable of modification at examination.	due to its shift work patterns and that most employees live far from the MINI Plant.
Policy SPS4 – MINI Plant	
Do you consider that the policy is sound?	No
If not, is it because it is not: <ul style="list-style-type: none"> • positively prepared? • justified? • effective? • consistent with national policy? 	Effective
Do you consider that the policy is legally compliant?	N/a
Do you consider that the policy complies with the duty-to-cooperate?	N/a
Please give details, as precisely as possible, of why you consider that the policy is not legally compliant or is unsound or fails to comply with the duty to co-operate.	<p>BMW welcome this policy's support for the intensification and modernisation of the MINI Plant, subject to addressing the following comments.</p> <p>We understand the Local Plan's wider objective to deliver employment-related housing where appropriate. However, there is no intention to provide residential development within the MINI Plant, and therefore any references to this should be removed.</p> <p>As stated for policies G3 and G5, there should be some consideration given to the prioritisation of Category 1 employment floorspace in relation to the UGF tool, and a recognition of the challenges inherent in attempting to 'green' such a constrained brownfield industrial site in a significant or meaningful way.</p> <p>As stated for policy HD9, the 15m height limit should be clarified and justified.</p> <p>The following paragraph refers to habitable spaces of which there are none at the MINI Plant so this needs to be rewritten.</p> <p><i>'Adjustments and considerations at design stage may be helpful in reducing the ongoing impact of poor air quality. Potential options may include considering layout options that place habitable spaces and openings away from pollution sources such as busy roads, landscape buffers, and designing in walking and cycling options as integral part of schemes.'</i></p> <p>The MINI Plant will not support the viability of the Cowley Branch Line as staff work in shifts</p>

	and many come from places away from Oxford by car due to the cost and short supply of local housing.
Please set out what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Remove references to residential development and support for this in the defined threshold. Remove reference to residential uses in relation to air quality. Justify the 15m height limit.
Chapter XX / Policies Map / Sustainability Appraisal	
Do you wish to comment on any other part(s) of the Chapter? Please state the relevant section or paragraph reference(s).	No
Do you consider that the Chapter complies with the duty-to-cooperate?	
Do you consider that the Chapter is sound?	
Do you consider that the Chapter is legally compliant?	
Please give details, as precisely as possible, of why you consider that the stated part(s) of the chapter is not legally compliant or is unsound or fails to comply with the duty to co-operate. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.	
Please set out what change(s) you consider necessary to make the stated part(s) of the chapter legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above (please note: non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible	