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Dear Sir / Madam

**Oxford Local Plan 2040
Local Plan Representations
Meadowside Retail Park
On behalf of Shell Trust (UK Property) Ltd**

Savills is instructed by Shell Trust (UK Property) Ltd to submit the following representations on the Local Plan Regulation 19 Consultation: Submission Draft (November 2023).

In general, we support the content of the draft Local Plan, particularly Policy SPCW8 which refers to the Botley Road Retail Park and the encouragement of employment uses.

Notwithstanding this, we have made comments on relevant parts of the plan below, particularly in relation to Chapter 1, Chapter 5 and Chapter 6. These are put forward in a constructive manner to ensure that Local Plan has the best chance of being found sound at the subsequent Local Plan Examination.

We are providing comments on the plan in relation to the Meadowside Retail Park which is located adjoining Lamarsh Road.

Chapter 1 – Vision and Strategy

We support the vision for the City to provide a healthy and inclusive City with strong communities that benefit from equal opportunities, including support for research and development in the life sciences sectors which will provide solutions to global challenges. The overarching themes and threads of the Plan are acknowledged and supported including the need to address climate change and to create a more healthy, equal, inclusive and prosperous city.

Chapter 5 – A City that Utilises its Resources with Care, Protects the Air, Water and Soil and Aims for Net Zero Carbon

Chapter Five of the Local Plan primarily relates to the use of resources and carbon emissions. We are committed to providing sustainable development and ensuring this is at the heart of any development. We therefore support the overall aims of the Local Plan in regards to sustainability.

Comments are provided on specific policies set out in the draft plan below:



Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
R1	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	
				Consistent with National Policy	

The introduction of whole life carbon requirements are welcomed however the removal of BREEAM is disappointing as it does ensure a comprehensive approach to sustainability.

The targets set out in Criteria 2 are completely unachievable for life science buildings. Limits should not be placed on innovation or safety which require energy intensive equipment, high fresh air rates and significant cooling requirements.

The policy also seeks to achieve 100% of on-site energy needs to be generated on site. This policy is potentially costly to developers and operators and difficult to implement for OCC. We need to understand more details on how the payment would be applied, what the level the cost would be and how these contributions would be utilised.

The policy wording should be amended to provide greater flexibility.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
R2	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	
				Consistent with National Policy	

Policy R2 relates to embodied carbon in the construction process seeking to ensure that this is minimised as far as possible through careful design choices. The policy therefore allows for flexibility on the approach and allows for the re-development of a site and the demolition of buildings to be robustly justified which is supported by us. The policy should not unduly constrain the redevelopment of sites to make the most efficient use of land by having to retain existing buildings. The policy wording should provide greater flexibility.

Chapter 6 – A City of Culture that Respects its Heritage and Fosters Design of the Highest Quality

We largely support the policies in this chapter which strives for the highest quality design in all new development. Comments are provided below in relation to Policy HD9.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
HD9	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	
				Consistent with National Policy	

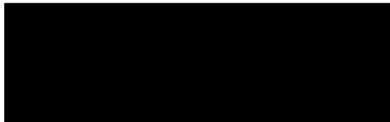
Policy HD9 requires the provision of a visual impact assessment for any development over 15 metres (or the height that the High Buildings TAN says may be impactful in that area if that is higher). The special significance of the views of Oxford's historic skyline, both from within Oxford and from outside is acknowledged. However, there are parts of the City where there is less sensitivity and therefore the requirement for the visual assessment should be proportionate. The wording of the policy should be amended from requiring 'extensive information' to provide greater flexibility. Amended wording is suggested below:

Applications for any building that exceeds 15 metres (or the height that the High Buildings TAN says may be impactful in that area if that is higher) will be required to provide ~~extensive~~ **proportionate** information so that the full impacts of any proposals can be understood and assessed. ~~This may include including:~~

Conclusion

We trust that the above comments will be taken on board in a constructive manner in order to provide a Local Plan that meets the requirements of the NPPF, including being flexible, deliverable and sound.

Yours sincerely



Roger Smith
Planning Director