

Oxford City Council
Planning Policy
Oxford Town Hall
St Aldate's,
Oxford
OX1 1BX

SENT VIA EMAIL

5 January 2024

Dear Planning Policy,

**OXFORD LOCAL PLAN 2040 PROPOSED SUBMISSION DRAFT
(REGULATION 19) CONSULTATION**

Our behalf of our client, NewRiver Retail Property Unit Trust 3 (NRR), we write in response to the Oxford Local Plan 2040 Proposed Submission Draft (Regulation 19) Consultation. NRR is the long leaseholder of Gloucester Green (which includes the retail units and the square).

The site is located within the Oxford City Centre which is defined in the adopted Local Plan as the primary focus for shopping, employment, leisure, education as well as a major tourist destination which is vitally important to the overall success of Oxford. Furthermore, the site is identified within the proposed West End and Botley Area of Focus.

NRR is committed to the long-term success and continued improvement of the public realm at Gloucester Green and its future role within the Oxford City Centre. We have reviewed the new Local Plan 2040 document and overall support the new Local Plan and its overarching ambitions. We do, however, have some comments on specific areas as set out below.

Policy C2 Maintaining Vibrant Centres

We are supportive of the aspirations of this policy.

Gloucester Green is one of Oxford's largest public spaces and NRR is committed to its long-term investment and continued success. There are opportunities for public realm enhancements to strengthen the character and attractiveness of the Green which will in turn attract greater numbers of visitors.

Key Public realm opportunities at Gloucester Green include increased soft landscaping and greening as well as opening up the Green onto George Street to improve permeability and sightlines to the University of Oxford's Faculty of History. This will create enhanced views from the Green to the Faculty of History to help celebrate Oxford's role in the knowledge economy and maintain a vibrant city centre.

Site Allocation Policies within West End and Botley Area of Focus

As drafted, the site allocations within the West End and Botley Area of Focus include; Oxpens, Osney Mead, Nuffield Sites and Botley Road Retail Park.

As a city centre site, we recognise a key development opportunity at the Odeon Cinema site on the southern edge of Gloucester Green. This site is in a highly sustainable location approximately 500m from Oxford Train Station and approximately 50m from bus stops along George Street.

Whilst it is not recognised as a specific site allocation, we consider that this site should be prioritised for redevelopment. The site could be key to supporting the identified need for new tourist and visitor accommodation. Such development would support nearby commercial operations and enhance the overall vitality and viability of the Oxford City Centre. Appropriate accommodation would include hotels and aparthotels. This would support Oxford's function as a major tourist destination as well as freeing up existing short term tourist accommodation such as Air BnB's back to private long-term housing. Critically, redevelopment of the Odeon site could improve footfall to this part of the City Centre and ensure its future vitality and viability.

Furthermore, the redevelopment of the Odeon presents an excellent opportunity to support the opening up of Gloucester Green to create an enhanced public realm environment and improve sightlines from the Green to the University of Oxford's Faculty of History.

Policy C9: Electric Vehicle Charging

Policy C9 sets out that for new build residential development, all dwellings with a dedicated parking space must provide access to electric vehicle charging infrastructure. For all non-residential development providing one or more car parking bays, access to electric vehicle charging infrastructure must be provided.

We support the drive for sustainable development and focusing development activity in the city centre promotes the most sustainable commuting and travelling patterns, minimising trip lengths and the need to travel by car.

However, this policy as currently drafted is particularly onerous and may potentially deter investors or visitors to the City. The costs of upgrading existing electricity infrastructure may be prohibitive, and the cost of upgrades to the wider electricity supply and distribution network to support EV charging would likely add a further financial burden to existing and new commercial operations and may impact businesses' ability to remain competitive.

We, therefore, request that this policy is amended so that providing onsite electric vehicle charging infrastructure is only required subject to technical feasibility and financial viability.

Aparthotels

The glossary on page 55 sets out that aparthotels are treated as residential uses, for which affordable housing provision is sought, and are not considered as short stay accommodation for the purposes of policy. Aparthotels accommodate short term stays of visitors and therefore, they should not be viewed as residential. Furthermore, aparthotels provide a range of services that are very different from residential accommodation. These often include 24/7 concierge service, cleaning and laundry services, vending machines and on-site management.

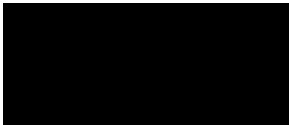
As such, aparthotels should not be treated as residential uses and the glossary should be changed to include aparthotels as 'short stay accommodation'.

Conclusion

We hope that these representations will be incorporated in the next iteration of the Plan, and that the Council takes this opportunity to engage constructively with NRR as a major investor.

We look forward to hearing from you.

Yours sincerely

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Phil Villars