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Dear Planning Policy Team

LOCAL PLAN REGULATION 19 CONSULTATION: SUBMISSION DRAFT LOCAL PLAN NOVEMBER 2023

Savills is instructed by SIAHAF to submit the following representations on the Local Plan Regulation 19 Consultation: Submission Draft, November 2023.

SIAHAF's interest in Oxford is primarily the proposed allocation at Policy SPCW4 – "Canalside Land, Jericho." SIAHAF own this site, known as "Jericho Wharf" and intend to bring it forward for development in due course to ensure it is delivered early in the Plan period.

This site is the subject of 20/01276/FUL allowed on Appeal in February 2023. This permitted a four storey residential development (comprising 18 dwellings) and a community centre and so has been demonstrated to be well suited to higher density development. Application SIAHAF is currently reviewing the options and initial studies identify that the site could accommodate more development making best and most efficient use of the land. In line with the Council's aim to maximise its ability to address its needs within the boundaries of the City it is therefore considered appropriate for amendments to the policy.

As drafted Policy SPCW4 reads:

Planning permission will be granted for a mixed-use development at the Canalside Land that includes all the following:

- a) Residential dwellings;
- b) A sustainably-sized community centre;
- c) Public open space/square;
- d) Replacement operating boatyard;
- e) To provide electric charging points for mooring boats;
- f) A contribution towards the upgrade of the tow path between the site and Hythe Bridge Street; and
- g) A contribution towards the upgrading of the existing bridge over the canal.

Other complementary uses will be considered on their merits

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However, SIAHAF provide the following comments to the proposed wording of the allocation policy as it is currently drafted, and the purpose of this letter is to propose amendments to secure a sound deliverable allocation.

Policy or Paragraph Reference	Legally Compliant?	Sound?	If Unsound it is because it is <u>not</u> :		
SPCW4	Yes	No	Positively Prepared		
			Justified		X
			Effective		X
			Consistent with National Policy		

SIAHAF consider that the scope of the policy as currently proposed is too restrictive and does not have due regard to other policies of the Local Plan. Additional flexibility in the policy will ensure that the proposals can make the best and most efficient use of the land.

For example, Policy H9 as drafted reads, *“Planning permission will only be granted for student accommodation in the following locations:*

- *On or adjacent to an existing university or college campus or academic site, or hospital and research site, and only if the use during university terms or semesters is to accommodate students being taught or conducting research at that site; or*
- *In the city centre or a district centre; or*
- *On a site which is allocated in the development plan to potentially include student accommodation.”*

Jericho Wharf clearly accords with the first bullet point in this policy so it would be logical to expand the list of acceptable uses within the allocation policy to include student accommodation, so that the policy is flexible in its requirements and so it aligns with Policy H9. The potential use of the site for student accommodation is supported by Worcester College.

SIAHAF has no objections to the other uses proposed to be included in the allocation but would stress the need for the Council to be realistic. The previous appeal was heavily influenced by viability and it should be recognised that a replacement boatyard of the size previously envisioned for this site may no longer be a viable commercial proposition.

As drafted, Policy SPCW4 permits “A sustainably sized community centre” and a similarly pragmatic approach is needed to maximise the chances of this site being delivered as envisioned. The policy should allow for any planning application to provide viability evidence to justify an alternative development to come forward if the commercial conditions worsen in the future. This flexibility is essential if this derelict site is to be regenerated.

Proposed amendments to policy

Given the above, SIAHAF would recommend the following amendments to the first paragraph of the Policy SPCW4:

“Planning permission will be granted for a mixed-use development at the Canalside Land that includes all the following (subject to viability):

- a) Residential dwellings **and/ or Student accommodation;***
- b) A sustainably-sized community centre;*
- c) Public open space/square;*
- d) **A sustainably-sized** operating boatyard;*
- e) To provide electric charging points for mooring boats;*
- f) A contribution towards the upgrade of the tow path between the site and Hythe Bridge Street; and*
- g) A contribution towards the upgrading of the existing bridge over the canal.*

Other complementary uses will be considered on their merits.”

SIAHAF has no comments on the remainder of the policy which generally covers matters of detail that will be addressed through the usual process of a detailed planning application.

Conclusion

We trust that the above comments are 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. If you have any questions in relation to these representations, please contact Rob Linnell at the above address.

Yours faithfully



SAVILLS