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L 240105 DB RLMIS Local Plan Regulation 19 Repls OCC FINAL



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Dear Sir / Madam

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

Savills is instructed by Royal London Mutual Insurance Society (hereafter referred to as RLMIS) to submit the following representations on the Local Plan Regulation 19 Consultation: Submission Draft, November 2023.

In general, RLMIS support the content of the draft Local Plan. Notwithstanding this, we have the following comments to make. 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.

RLMIS is providing comments on the plan on the basis of interests in the city which include a site at Arc Oxford (formerly Oxford Business Park).

Chapter 1 – Vision and Strategy

RLMIS support the vision for the City to provide a healthy and inclusive City with equal opportunities which respects its identity, heritage and maximises the opportunities to enable business, knowledge and innovation to grow. The overarching threads of the Plan are acknowledged including the need to address climate change, reducing inequalities and the creation of a liveable city.

Chapter 3 – A Fair and Prosperous City with a Globally Important Role in Learning, Knowledge and Innovation

The chapter recognises the uniqueness of Oxford in terms of employment. The City is characterised by the presence of the two universities and teaching hospitals and this provides an attractive location for a range of companies which include medical research and life science sectors. This results in a number of ‘spin-out’ businesses due to the availability of graduates. The policies in this chapter seek to maintain the vitality of the employment industry but noting that this needs to be balanced in the context of the competing demands for meeting the needs for housing in Oxford. This is recognised by RLMIS as a key issue for the City and development proposals within it.

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Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
E1	Yes	Yes	Comment	Positively Prepared	
				Justified	
				Effective	
				Consistent with National Policy	

Policy E1 sets out the employment strategy for the City outlining categories of employment uses and what development opportunities are appropriate for each. In a general sense RLMIS support the approach proposed however, note that the first sentence of the policy identifies that the efficient use of land in existing sites is supported alongside sustainable development through the re-use and upgrading of existing buildings. This is a very restrictive approach to the efficient use of land and does provide a restraint on the development opportunities especially where intensification is proposed. It is suggested that this policy should align more closely with policy R2 (see below) which enables demolition where it is demonstrated as the most feasible option. Amended wording is suggested below:

All new development on employment sites needs to show that it is making the best and most efficient use of land and premises and positively promotes sustainable development through the upgrading and re-use of existing buildings, **or where redevelopment of the site, including demolition has been robustly justified in line with Policy R2**, and does not cause unacceptable environmental impacts.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
E3	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	X
				Consistent with National Policy	

Policy E3 relates to the provision of affordable workspace on the existing commercial sites which includes ARC Oxford (Formerly Oxford Business Park). The provision of an affordable work space strategy as part of masterplans should not prejudice owners of plots who are not party to Masterplans which may or may not be prepared by third parties. Furthermore, any provision of affordable workspace should be subject to viability assessment to ensure that it does not prevent appropriate development coming forward. Therefore, in order to protect sites which may be caught by this policy it is suggested that amendments to the wording is included to ensure that viability of plots is not adversely affected.

Development proposals delivering commercial development on the following sites are expected to deliver (subject to viability) affordable workspace as part of their masterplans:

- ARC Oxford
- Oxford Science Park
- Oxpens
- Osney Mead
- Nuffield Sites
- Kassam Stadium and Ozone Leisure Park
- Unipart

- Northern Gateway

Details of the size, marketing, servicing and the management of the spaces should be set out in an affordable workspace strategy.

Chapter 4 – A Green Biodiverse City that is Resilient to Climate Change

RLMIS supports the Council’s aims of preserving green infrastructure and biodiversity through the protection of existing assets and encouraging the enhancement of existing and provision of additional green infrastructure. The specific comments relating to the policies in this section are set out below.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
G3	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	
				Consistent with National Policy	

The Urban Greening Factor policy requires developments to provide a level of green infrastructure on site with no ability for off-setting as would be the case with biodiversity net gain. RLMIS support the encouragement of the inclusion of green spaces but this would be considered in the normal realm of planning considerations. On sites where land ownership beyond the site is limited and the required levels cannot be achieved this policy could sterilise development opportunities at the site and limit how efficiently the land can be used. Given that the Draft Local Plan requires the provision of biodiversity net gain at a level of 10% and this enables off site provision to avoid the sterilisation of sites it is considered that this policy is surplus to requirements.

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. RLMIS acknowledge the Council’s declared ‘Climate Emergency’ and are committed to providing sustainable development. In relation to the specific policies set out in the draft plan the comments below are provided.

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	X
				Consistent with National Policy	

The Energy Use Intensity (EUI) targets set out in the policy are impractical and unachievable for many forms of development. In particular the life science sector which require laboratory uses, for which there is a great demand, could not achieve either of these targets making any development of this sort conflict with policy. This provides an unnecessary issue for developers of this form of development to address. Alternative wording for this part of the policy is set out below.

The Policy also seeks to achieve 100% of on site energy needs to be generated on site. With energy intensive development this is unlikely to be achievable and therefore, the only options for this form of development may be off-site generation or contributions towards Carbon Offsetting in a scheme which will be managed and operated by the Council. It is unclear from the papers available at this stage how the Council will utilise these contributions and no fund, or scheme's have been established to ensure that the contributions truly deliver necessary offsetting.

The above comments should be fully explored and justified and a suitable mechanism for off-setting established before the proposals can be considered effective.

2. A total Energy Use Intensity (EUI) figure for the development has been provided, calculated using an approved methodology as set out in supporting text. Developments will not be permitted where they exceed the following Energy Use Intensity targets, **exceptions will be allowed where the development type justifies higher EUI targets and this is fully demonstrated through the application submission:**

a) Residential: 35 kwh/m2/yr

b) Non-residential: 70 kwh/m2/yr

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
R2	Yes	Yes	Comment	Positively Prepared	
				Justified	
				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. In principle this approach is supported by RLMIS however, the policy should be caveated to ensure that the redevelopment of sites to make the most efficient use of land is not unduly constrained by having to retain existing buildings. The policy allows for flexibility in this approach by requiring loss to be fully justified as part of future proposals. This policy is therefore supported by RLMIS.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
R3	Yes	Yes	Comment	Positively Prepared	
				Justified	
				Effective	
				Consistent with National Policy	

RLMIS support this policy where buildings are retained.

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

RLMIS recognise the unique history and sensitivity of the City of Oxford to development which could potentially impact this uniqueness. In general the policies for the protection of the heritage and strive high quality design are supported however, some comments specific policies of this section are set out below.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
HD9	Yes	Yes	Comment	Positively Prepared	
				Justified	
				Effective	
				Consistent with National Policy	

Policy HD9 remains largely as per the currently adopted Local Plan however, one key change has been made. This requires the provision of a visual impact assessment for any development over 15 metres anywhere in the City. It is acknowledged that the skyline of Oxford is sensitive to change however, there are parts of the City where there is less sensitivity and so the requirement for the visual assessment should be proportionate. The policy is currently worded to require 'extensive' information and some flexibility in the policy should be provided for where the level of information can be moderated. 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:

Chapter 7 – A Liveable City with Strong Communities and Opportunities for All

This chapter of the plan focuses on ensuring accessibility to facilities to enable the daily needs of residents to be closely located to their homes. The chapter notes that a number of tools can be used to support and sustain liveable cities which include protecting facilities, managing parking and requiring travel plans associated with new development. RLMIS support these aims in principle however, have the following comments to make regarding specific policies in this chapter.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
C6	Yes	Yes	Comment	Positively Prepared	
				Justified	
				Effective	
				Consistent with National Policy	

The policy as proposed contains ambiguous wording in relation the transport measures associated with the development. The use of the words 'adequate and appropriate' are not properly defined nor do they align with the NPPF which requires it to be demonstrated that the impact of proposals on highway safety would not be severe. The wording of this policy should be amended to read 'necessary' to make this part of the policy sound.

In relation to bullet point a) of the policy is ambiguous and should be amended to include the word unacceptable to ensure that the transport assessment is focussed.

The policy makes references to the County Council Street Design Guide and the requirement for CLOCS accreditation for any Construction Traffic Management Plan. This provides an inflexible approach where, should these documents or standards be amended or removed compliance with the policy could not be achieved. If these need to be specifically referred to in the policy it should include the caveat of other reasonable alternative guidance/ standards) subject to agreement with the City Council.

Within the policy the terminology changes from “Delivery and Service Management Plan” to “service and delivery plan”, this should be made consistent within the policy. It is also unclear what ‘Substantial’ refers to in relation the triggering the need of such a plan. This should be more clearly explained.

Similarly, the requirement for a Construction Traffic Management Plan (CTMP) is noted as being required where ‘significant’ amounts of movement There should be a definition of “significant” provided in terms of scale of movement. Notwithstanding this development proposals often do not have a contractor on board at the application stage. Contractors are those operating on site and are best placed to provide the appropriate CTMP for the development. This is historically a matter which is conditions as part of a planning permission and this is the most appropriate route within which to control this matter. This element of the policy should be omitted or replaced with a note that CTMP’s will be required on any approved planning permissions. Text changes proposed are outlined below

Planning permission will only be granted for development proposals if the City Council is satisfied that **necessary adequate and appropriate** transport-related measures will be put in place.

A Transport Assessment (TA) or Transport Statement (TS) must be submitted for development that is likely to generate significant amounts of movement, in accordance with the thresholds set out in Appendix 7.2.

Transport Assessments must assess the multi-modal impacts of development proposals and demonstrate the transport measures which would be used to mitigate the development impact to ensure:

- a) there is no **unacceptable** impact on highway safety to be assessed on a case-by-case basis;
- b) there is no unacceptable residual cumulative impact on the road network;
- c) pedestrian and cycle movements are prioritised, both within the scheme and within neighbouring areas;
- d) access to high quality public transport is facilitated, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- e) the needs of people with disabilities and reduced mobility in relation to all modes of transport are addressed;
- f) the development helps to create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards as set out in the [Oxfordshire County Council Street Design Guide](#) **(or other suitable alternative as agreed with the Council)**
- g) the efficient delivery of goods, and access by service and emergency vehicles is allowed for; and

h) charging of plug-in and other ultra-low emission vehicles is enabled in safe, accessible and convenient locations with designated bays and priority for car clubs

A Travel Plan, which has clear objectives, targets and a monitoring and review procedure, must be submitted for development that is likely to generate significant amounts of movement in accordance with the thresholds set out in Appendix 7.3. Travel Plans must support outcomes (a) to (h) set out above.

Where a Travel Plan is required under this policy and a substantial amount of the movement is likely to be in the form of delivery, service and dispatch vehicles, a Delivery and Service Management Plan will be required.

Small sites where servicing space is restricted will be required to submit a **Delivery and Service Management Plan** ~~service and delivery plan~~.

Where a Delivery and Service Management Plan is provided this should set out how deliveries will be managed and demonstrate how impacts will be minimised including congestion, safety, noise and how zero or ultra-low emission and last mile opportunities will be considered.

A Construction Traffic Management Plan must be submitted for development that is likely to generate significant amounts of movement during construction. This CTMP must incorporate the CLOCS (Construction, Logistics and Community Safety) standards where applicable (**or other suitable alternative as agreed with the Council**).

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
C8	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	
				Consistent with National Policy	

This policy relates to parking standards for both residential and non-residential schemes. For residential schemes the policy refers frequently to ‘low-car’ residential development although this phrase is not defined as part of the glossary of terms at the beginning of the chapter. This would be a sensible addition given the widely ranging approach to parking standards between Council’s.

In relation to the non-residential standards the Council’s ambitions to reduce those arriving by the private vehicle are commendable however, the reality is that for a number of locations the park and ride facilities or frequency and range of bus routes do not make it a reasonable option for those who live outside of the City. This also needs to be considered in the context of the commerciality of commercial development. Whilst the attitudes of works and companies are changing in relation to how they access the normal place of work, there remains a desire to have convenient parking associated with commercial development especially where public transport is not frequent.

The Council’s Local Plan at Policy E1 encourages the intensification of employment sites by making the best and most efficient use of the land. This encouragement is countered by the parking policy which outlines that no net increase in parking would be supported, indeed, encouraging a reduction where there is good accessibility to a range of facilities. Where development is provided at a greater density, there may be

justification for additional parking, particularly where there is limited access to alternative forms of transport. The policy should be amended to allow for this where robust Transport Assessments and justification are provided.

On the basis of the above we would propose the following variations in the text:

In the case of the redevelopment of an existing or previously cleared site, there should be no net increase in parking on the site from the previous level **unless robust evidence is provided which demonstrates an increase in parking is appropriate for the site.** The Council will **encourage a reduction in parking** where there is good accessibility to a range of facilities **and frequent public transport.**

Chapter 8. Development Sites, Areas of Focus and Infrastructure

This chapter sets out the site specific allocation policies for the Local Plan.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
SPS1	Yes	Yes	Comment	Positively Prepared	
				Justified	
				Effective	
				Consistent with National Policy	

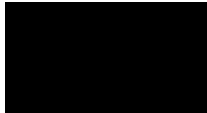
RLMIS support the policy which relates to the ARC Oxford site, however, considers that additional wording should be included in the policy in relation to the comprehensive masterplan. The site is in multiple ownership which brings inevitable uncertainty around whether a deliverable comprehensive masterplan which covers the whole site will be forthcoming, and the status of any such masterplan that is prepared. Where a masterplan is prepared the policy should be re-worded to ensure that individual development proposals do not undermine the principles of the masterplan. This will enable the redevelopment of the sites to come forward without conflict with the wider aims and ambitions for the site or indeed come forward where there isn't a masterplan in place. The following amended wording is proposed.

Urban design and heritage
 Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. New development proposals should seek to improve both the place-making on this site, connectivity and permeability and recognise its relationship to the wider area as part of a comprehensive master plan, **or, if an individual site, does not undermine the principles of an agreed master plan.** Opportunities should be taken through the masterplan and as individual schemes come forward to enhance the external appearance of this site, its landscape setting and create new public open spaces for occupiers of the park and community use.



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. If you have any questions in relation to these representations, please contact either Dawn Brodie or Emma Andrews at the above address.

Yours faithfully



SAVILLS