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Dear Sir / Madam

REPRESENTATION ON BEHALF OF THE OXFORD SCIENCE PARK (PROPERTIES) LTD TO OXFORD CITY COUNCIL'S REGULATION 19 (LOCAL PLAN) CONSULTATION

We are instructed by The Oxford Science Park (Properties) Ltd to submit representations to Oxford City Council in respect of the Regulation 19 'Oxford Local Plan 2040.' This letter builds on our previous representations to the 'Preferred Options' and 'Issues and Options' consultations and provides background and contextual information about The Oxford Science Park, before setting out our client's representations.

Background and Context

The Oxford Science Park is designated as a Category 1 Employment Site and is an allocated site under Policy SP9 of the Oxford Local Plan 2036. It is also home to over 50 emerging life science companies and is the HQ of two of Oxford's most successful businesses, Exscientia and Oxford Nanopore. Companies on The Oxford Science Park are growing rapidly and require significant additional research-led employment space. If suitable buildings are not provided, there is a material risk that some of these companies could leave Oxford.

Planning permission was granted in 2021 for Plot 16, which will deliver a total of 19,030 sqm (GIA) of R&D floorspace (application reference no:19/02003/FUL). Planning permission was granted in October 2023 for Plots 23-26, which will deliver a total of 41,598sqm of R&D floorspace (application reference no.: 22/02168/FUL). The Oxford Science Park has submitted a planning application at Plot 27, which proposes 9,306sqm of laboratory and office floorspace (application reference no: 22/02555/FUL) and is pending determination.

Much of the demand for lab and office space and attraction to Oxford is fuelled by the reputation of Oxford's academic institutions and its contributions to addressing global healthcare and sustainability challenges, including fighting the COVID-19 pandemic. This demand is steadily growing and, whilst there has been significant investment from existing and new companies, as well not-for-profits such as the Ellison Institution at Littlemore Park/The Oxford Science Park, the supply of laboratory stock remains critically low and is dampening growth. This limited availability of laboratory space is set to continue in the short term¹.

Failure to meet this demand quickly enough can not only mean lost opportunity in accommodating new startups and established international R&D businesses, but also the loss of existing growing companies to other UK clusters and even other countries. The Oxford Science Park is key to Oxford's meeting this demand.

¹ Savills Research, 2023 https://www.savills.co.uk/research_articles/229130/350489-0

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Representations

This section of the letter provides our representation in response to the Plan, particularly whether the Plan meets the tests of soundness set out in Paragraph 35 of the National Planning Policy Framework 2023 (NPPF).

Our overriding concern is that many of the proposed policies add cost and uncertainty to the planning process, as well as substantial cost to the construction of new developments and refurbishments. Those will have to be reflected in rents charged to occupiers, many of which are early-stage, often pre-revenue and certainly not yet profitable. Increasing the cost of occupation for these companies, on top of the substantial rise in Business Rates, will reduce the funding available for their research and development activities and risks driving many away from Oxford to more competitive locations. That would have a profound and potentially irreversible impact on Oxford's position as a leading centre for innovation.

Responses are provided, using the same chapter and policy numbering as the draft plan.

Chapter 1: Vision and Strategy

- Vision – Page 7

Paragraph 85 of the NPPF outlines that significant weight should be placed on supporting local business needs and the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future, particularly where Britain can be a global leader in driving innovation. As the life science and health sectors form a key strength for Oxford, at both a local and international level, The Oxford Science Park welcomes the Vision's support for "*research and development in the life sciences and health sectors which are and will provide solutions to global challenges.*" It is considered that this is consistent with national planning policy, notably Paragraph 85 of the NPPF but the Vision should not be undermined by other proposed policy changes that act both individually and in aggregate to weaken Oxford's competitive position.

- Objective – Page 12

The Oxford Science Park supports the inclusion of the objective that Oxford will be a fair and prosperous city with a globally important role in learning, knowledge and innovation. Paragraph 1.11 specifically references The Oxford Science Park as a well-established area for the knowledge economy which is further supported. It is, however, noted that the word "fair" can be interpreted in different ways and it is therefore important that this objective translates into concrete proposals which can be considered on their own merits.

- Policy S1 (Spatial Strategy and Presumption in Favour of Sustainable Development) – Page 20

Paragraph 87 of the NPPF outlines planning policies should recognise and address the specific locational requirements of different sectors, including making provision for clusters or networks of knowledge in suitably accessible locations. It is considered this policy aligns with Paragraph 87 and we welcome the policies support for locating new research and development on existing sites already in that use. This will consolidate the provision of R&D uses to existing locations, building upon the existing ecosystem generated by locations such as The Oxford Science Park.

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

- Policy E1 (Employment Strategy) – Page 58-59

We support the recognition of The Oxford Science Park as a Category 1 employment site and the general presumption stated in Policy E1 for the intensification and modernisation of any Category 1 or 2 employment site. This will ensure existing R&D locations can deliver further R&D floorspace, particularly where vacant plots of undeveloped land are not available, and intensification of existing

developed sites is required to deliver further R&D floorspace. Creating higher density clusters will also help to support the provision of public transport.



- **Policy E3 (Affordable Workspace Strategy and Affordable Workspace provision on Commercial Sites) – Page 61**

The Oxford Science Park recognises that reducing inequalities is a key theme for the Local Plan 2040 and considers that economic productivity has a key role to play in this. However, we consider that Policy E3 should not apply to The Oxford Science Park, and we request that it be deleted from the list of sites included under this Policy that are expected to deliver an affordable workspace strategy and to provide affordable workspace.

The definition of ‘Affordable Workspace’ provided in the glossary to the draft Local Plan refers to “workspace to be delivered on commercial sites which would be available for rent set at an agreed rate below the commercial rent (e.g., 50% of market rent).” We consider it is essential that The Oxford Science Park has complete flexibility to determine rents and the terms provided for space on the Park, so it can respond to market conditions and meet tenant and occupier needs. To add compliance with additional market controls controlled under planning is unnecessary and burdensome. One of the key differentiators of a science park from business parks and other forms of commercial development, is the focus on establishing an ecosystem and being able to provide a range of floorspace on differing terms designed to meet the needs of businesses ranging from spinouts and start-ups to mature businesses. The Oxford Science Park is recognised for successfully achieving this and which distinguishes it from being a standard “commercial site.”

The Oxford Science Park has ‘The Magdalen Centre,’ which is a concentration of buildings that together provide one of the largest innovation centres in Europe. A range of laboratory and office space is provided, some already fitted, with shared laboratory equipment suites and management and support services. Planning permissions recently granted by Oxford City Council provide for a range of differing occupier needs, including Plots 16 and 23-26 and an application is pending determination at Plot 27 for a development specifically designed for start-up accommodation. As these developments are being brought forward, refinements are being made to adapt them to meet market demand and to address the challenges around designing buildings to meet the needs of companies working in dynamic and knowledge-based sectors.

NPPF (paragraph 87) requires planning policies and decisions to recognise and address the specific locational requirements of different sectors consistent with Government’s Vision in the Industrial Strategy. To require The Oxford Science Park to provide affordable workspace is not justified and would conflict with NPPF paragraph 87 and have a detrimental impact on the ability of The Oxford Science Park to determine and deliver the type of space required to deliver a successful ecosystem.

- **Policy E4 (Community Employment Procurement Plans) – Page 62**

Policy E4 requires non-residential applications over 1,000m² to be supported by a Community Employment and Procurement Plan (CEPP). The policy would be difficult for R&D development to comply with as R&D uses draw on a wide range of skills, many of which are highly specialised and rely on an international talent pool. In addition, the policy does not distinguish if the CEPP would apply to tenants as well as the developer. It would be wholly unreasonable to require the developer to enforce tenants to commit to the CEPP criteria, including commitments to paying all employees Living Wage, potentially undercutting Oxford’s ability to remain competitive comparative to other life science clusters

in the UK and abroad. It is not considered that this mandatory planning requirement would be justified and does not account for the nuances between different non-residential uses. It is requested that the policy wording excludes specialist commercial science. This request is consistent with our comments above to Policy E3.

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

- **Policy G3 (Provision of new Green and Blue Infrastructure) – Page 64**

We object to the requirement for Urban Greening Factor (UGF) assessment and to the introduction of minimum scores to be achieved. The NPPF state that Local Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (paragraph 181) and local planning authorities should take opportunities to improve biodiversity when assessing individual applications (paragraph 186). UGF is used in The London Plan and in other major cities across Europe, but there is no evidence that its use is justified in Oxford.

It is requested that this policy be deleted. The objectives of the policy would be met though other policies in the Local Plan, in particular Local Plan Policies, G2, G4 and G5 that seek a net gain in biodiversity.

Chapter 5: A City that utilises its resources with care, protects the air, water and soil and aim for net zero carbon

- **Policy R1 (Net Zero buildings in operations) – Page 103**

We object to Policy R1 on the grounds that the Policy is not evidenced and does not acknowledge or address the specific energy needs for research and development uses. Laboratory buildings typically require a significant amount of mechanical ventilation and air changes. Their power demand is typically 4-5 times more than that for a standard office building and can be even higher for more specialised requirements. In Oxford, it is widely reported that there is limited electrical power available until after Q4 2026, following the completion of significant reinforcement works to the Extra High Voltage (EHV) lines at all subsidiary substations within the Cowley Grid Supply Point area. That, together with the critical importance of back-up power from non-grid sources, makes this policy impracticable.

Policy R1 sets an Energy Use Intensity Target (EUIT) for non-residential development at 70 kwh/m²/yr. Whilst the role of all buildings in contributing to achieving a net zero carbon requirement by 2050 is recognised, the introduction of any standards must be evidence based. It is currently unclear how these standards have been set, including whether and how any references in UK guidance and/or legislation have been used. It is also unclear how EUIT targets will be calculated with no clear methodology referenced in the policy wording. This target is completely unachievable for life science building because of the energy intensive equipment required to deliver high fresh air rates and significant cooling requirements.

Background Paper 10 (Carbon reduction and net zero carbon development) acknowledges that there are uses which are naturally more energy intensive, such as research laboratories, and EUIT will naturally require a different approach when being applied to non-residential development.

The Policy seeks to introduce flexibility via the installation of off-site energy provision or making payment to the Council's offsetting fund when all energy needs cannot be met on site. It is, however, unclear what the levels of cost would be for offsetting schemes, adding further uncertainty. The levels of cost may impact the viability of life science buildings in the City. Please also see below our further comments on viability.

It is requested for Policy R1 to include explicit acknowledgement that certain non-residential uses naturally require a different approach regarding EUIT due to the energy needs for non-residential uses, such as research laboratories. This will ensure officer interpretation of non-residential applications accounts for the varied energy needs for different non-residential uses and a blanket approach is not

applied. To be sound, the policy must incorporate further flexibility to address site specific and use specific circumstances where there are opportunities for renewable generation adjacent to a site.

- **Policy R2 (Embodied Carbon in the Construction Process)**

National policy on embodied carbon is still emerging. Policy R2 relates to embodied carbon in the construction process seeking to ensure that this is minimised as far as possible. We consider this policy should be caveated to ensure that the redevelopment of sites to make the most efficient use of land are not unduly constrained by having to retain existing buildings. This requires the inclusion of financial viability and technical feasibility as factors to be considered in assessing Energy and Carbon Statements submitted in support of applications. We note that this will further increase the cost of making and determining any complex planning application and is likely to introduce delays into the process.

- **Policy R3 (Retro-fitting existing buildings) – Page 109**

The Oxford Science Park welcomes the policy’s support for retrofit measures to existing buildings where they secure energy efficiency improvements or adaptation to changing climate. This policy aligns with Policy E1 to deliver further R&D floorspace in existing locations where retrofitting and extending existing buildings will enable the delivery of further R&D floorspace on existing sites. We do, however, note that not all buildings are suitable for conversion and that new build tends to provide space that is not only better configured for modern usage but is also cheaper and more sustainable to run.

Chapter 8: Development Sites, Areas of Focus and Infrastructure

- **Policy CBLLOAF (Cowley Branch Line and Littlemore Area of Focus) – Page 180**

The Oxford Science Park supports the identification of the Cowley Branch Line and Littlemore Area of Focus and the particular focus on improving public transport to this area of the City, including the reopening of the Cowley Branch Line (CBL).

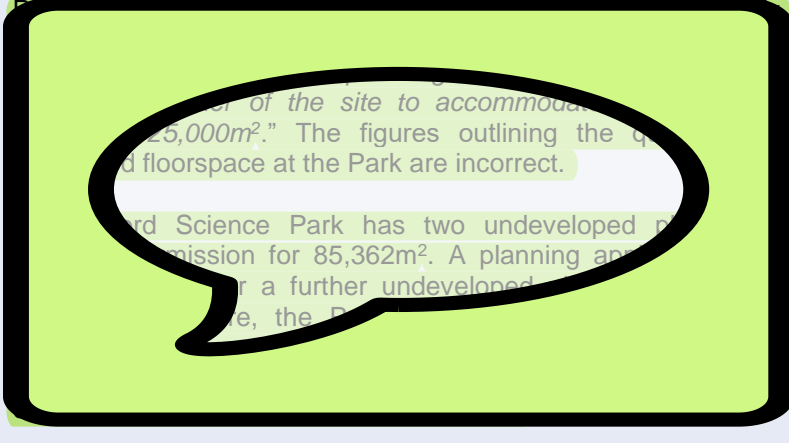
Policy CBLLOAF states “*Financial contributions from trip generating uses within a 1,500m buffer zone of the proposed CBL stations will be expected in order to achieve public transport enhancements in this area, including, among other sustainable transport measures, the delivery of the CBL.*”

The Council will be aware of the substantial support The Oxford Science Park is providing to the Council to obtain funding for CBL. These activities are already taking place outside of planning conditions/obligations attached to specific developments. NPPF paragraph 57, requires obligations to be sought only where they are necessary, directly related to the development; and fairly and reasonably related in scale and kind to the development. It is considered that the support already provided by The Oxford Science Park, whether financial or in-kind, should be taken account of when determining financial contributions to CBL on future applications at The Oxford Science Park. Planning law requires such contributions to be proportionate to the scale of the development and the City Council will recognise the need to ensure development comes forward to meet the demand for life science development. Our client is concerned about the individual and cumulative impact of the draft policies in the Plan on the viability of future development.

We are pleased that the Cowley Branch Line is clearly identified at section 7.1 of the Infrastructure Delivery Plan to ensure contributions secured in the CBLLOAF directly feed into funding identified for the Cowley Branch Line.

- **Policy SPS5 (Oxford Science Park) – Page 218**

Below is a table that provides our representations to Policy SPS5 (Oxford Science Park). The response is tabulated to identify the page / paragraph number and our response.

Page / Paragraph No	Response Support / Comment / Object	Comment
Page 194, 8.89	Comment	
Page 194, 8.94	Object	<p>Paragraph 8.94 states “<i>Preliminary analysis suggests that the limited presence of green infrastructure features on the site currently means it is likely to score below the minimum thresholds for green surface cover as required by Policy G3.</i>”</p> <p>This statement conflicts with the Area of Focus and Local Plan policies that seeks to make best use of land (see our objection to Policy G3). The Oxford Green Infrastructure Study (2022), which forms part of the evidence base for the Local Plan, outlines that the wider area of Littlemore scored a priority factor of 2 in terms of areas which require enhanced green infrastructure provision and/or quality based upon this initial contextual analysis. A priority factor of 2 scores lower on the scale and suggests that the local area is lower on list of priority areas which require green infrastructure enhancement. The Study also identifies canopy cover across the Science Park is characterised by an ‘Excellent’ rank accessible natural green space at Land adjacent to Eastern Bypass. The evidence base suggests that The Oxford Science Park does have green infrastructure features and paragraph 8.84 should be amended to remove reference to there being limited presence of green infrastructure features on site.</p> <p>Paragraph 8.94 further conflicts with the policy wording itself with paragraph 3 of Policy SPS5 stating “<i>The site and its perimeter contain significant existing trees, hedgerows and woodland which form the structural landscaping of the Science Park that are important to public amenity in the area and will provide valuable ecosystem services.</i>” This wording is contrary to paragraph 8.94 as the Policy identifies there is significant existing green infrastructure features including trees, hedgerows and woodland. Paragraph 8.94 is not justified and wording suggesting there is limited presence of green infrastructure features on site should be deleted.</p>
Page 196, 1	Support	<p>The Oxford Science Park welcomes the support for development and modernisation of buildings for research and development and office employment uses. This will support the site’s continued role as a R&D location of choice.</p>

Page / Paragraph No	Response Support / Comment / Object	Comment
Page 197, 1	Object	<p>Paragraph 196 of the NPPF identifies that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. Chapter 6 of the draft Plan sets out the strategy to conservation of the historic environment, including Policy HD9 (Views and Building Heights) which protects the City's historic skyline with reference to the High Buildings TAN.</p> <p>The first paragraph on page 197 states “<i>Development proposals will be expected to mitigate impacts to the sensitive skyline and surrounding area by avoiding built forms with excessively overbearing scale and massing, and avoiding roofscapes that are excessively uniform.</i>” We consider the underlined text is a subjective opinion and should be deleted. The impacts of development on the skyline should be assessed based on the merits of the design, which is provided for by High Buildings TAN and Policy HD9. These provide the Council with control over the design of future development proposals, as is referenced in Policy CBLLAOF (Cowley Branch Line and Littlemore Area of Focus). It is considered that the inclusion of the underlined wording places unnecessary restrictions specifically on The Oxford Science Park.</p> <p>The Oxford Science Park has not been identified in the evidence base as a particularly sensitive location for the skyline of Oxford comparative to other locations in the City, we request the underlined wording is deleted as it is not justified by proportionate evidence.</p>

Conclusion

We are delighted to participate in the public consultation on the Regulation 19 Oxford Local Plan 2040 and to submit these representations on behalf of The Oxford Science Park (Properties) Ltd. Our client plays a fundamental role not only to the local economy but the economic growth of the region and UK. Many of the companies on the Park are engaged in research and development with the potential to have a major positive impact on global health and sustainability challenges. Every effort should therefore be made to support a thriving global business innovation ecosystem which helps drive economic growth, provides highly paid and rewarding employment and makes substantial contributions to local taxation.

Our client is also committed to improving sustainable transport connectivity to serve not only The Oxford Science Park but the wider area, now and in the future. It is of utmost importance that the full potential of The Oxford Science Park is recognised in the Oxford Local Plan 2040 through the plan-making process. It is critical that current limitations of the transport infrastructure do not limit the continued development of the Park and wider area and its significant contribution being made to economic growth.

The below table summarises our representations to each local plan policy.

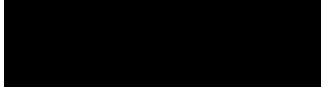
Policy Number	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u> :	
S1	Yes	Yes	Support	Positively Prepared	
				Justified	
				Effective	
				Consistent with National Policy	
E1	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	
				Consistent with National Policy	X
E3	Yes	No	Comment	Positively Prepared	X
				Justified	X
				Effective	X
				Consistent with National Policy	X
E4	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	
				Consistent with National Policy	
G3	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	X
				Consistent with National Policy	X
R1	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	X
				Consistent with National Policy	
R2	Yes	No	Comment	Positively Prepared	
				Justified	
				Effective	
				Consistent with National Policy	
R3	Yes	Yes	Support	Positively Prepared	
				Justified	
				Effective	
				Consistent with National Policy	
CBLLAOF	Yes	Yes	Comment	Positively Prepared	
				Justified	
				Effective	
				Consistent with National Policy	
SPS5	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	X
				Consistent with National Policy	

We request a meeting with Officer's to enable us to explain in more detail the implications of the policies addressed in this representation on The Oxford Science Park, both independently and cumulatively. We ask that the cost of the proposed policy changes are assessed and considered as part of any transparent decision-making process.



Please would you acknowledge receipt of this letter and contact me should you have any queries.

Yours sincerely



Emma Andrews
Director