

Our ref: Q220412
Email: [REDACTED]
Date: 05 January 2024



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

Dear Madam/Sir,

Warneford Hospital – Representations to Oxford Local Plan 2040 Proposed Submission Draft (Regulation 19) Consultation

These representations have been prepared by Quod, on behalf of the Oxford Health NHS Foundation Trust ('OHFT'), to respond to the Regulation 19 consultation being held by Oxford City Council ('OCC') on the Oxford Local Plan 2040 ('the Submission Draft').

1 Introduction

Our proposals are for Warneford Hospital to become synonymous with world class brain sciences and an unparalleled, state-of-the-art mental health hospital for the 21st century. A formal joint venture has been formed between the Oxford Health NHS Foundation Trust who currently own the site, the University of Oxford and a local charitable Trust to redevelop the Warneford Hospital site. In the near future, with significant funding and permissions in place, it is projected that today's 19th century facilities will be transformed into an exceptional new hospital complex at the heart of a globally significant brain health sciences campus – Warneford Park.

OHFT own Warneford Hospital and are committed to the redevelopment of the site with a landscape led, sustainable, state of the art development for mental healthcare, medical research and post-graduate education.

Following previous engagement with Oxford City Council ('OCC') Development Management Officers, OHFT are pleased to see that the Warneford Hospital has been allocated in the Submission Draft as SPE8. Overall OHFT is supportive of the intent of the Submission Draft.

These representations respond to the Draft Allocation relating to Warneford Hospital (SPE8), offering suggested alternative wording where necessary. A review is also provided of other directly relevant policies in the Submission Draft. These representations do not serve to review each and every policy.

For reference, direct quotes from the Submission Draft are included in *blue*, our suggested amendments are shown in *green*, and words suggested for removal are shown with a strikethrough in *red*.

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2 Draft Allocation

Site Allocation SPE8 of the Submission Draft allocates Warneford Hospital for healthcare facilities and complementary uses. The Site Plan is included for reference below at Figure 1. The Site lies within the East Infrastructure Area of Focus.



Figure 1 Warneford Hospital

OHFT fully support the allocation of the Site but request that some amendments are made to the specific policy wording of Site Allocation SPE8. These are set out in detail below.

Description of the Site

The descriptive text on page 251 of the Submission Draft requires some minor amendments in order to be factually accurate. In paragraph 8.223, this should be updated to reflect that the main hospital consists of **two principal** 19th century buildings, not just a single building.

Paragraph 8.225 should be amended to reflect that there is a second access to the Site from Warneford Lane. The paragraph currently states that “*Warneford Lane runs along northern boundary but there is no access from it.*” This is incorrect. There is a long-standing established vehicle and pedestrian access to the west of the Mortuary, and this will be retained.

Paragraph 8.226 must be updated such that the erroneous reference to ‘open fields’ is removed. The Site sits between two green corridors that comprise open areas, but are not fields. Indeed, within the Site itself, there are no open fields. Additionally, in this paragraph, reference to Warneford Meadow should be made singular i.e not Meadows. Further, this paragraph contains a surplus ‘of’ in the first line which should be removed, after ‘comprises’.

Proposed Use

OHFT support the recognition in the supporting text that a masterplan approach should be taken to address the complexities of the site. OHFT are in the process of preparing such a masterplan. The



emerging proposals would provide a new NHS mental health hospital, research and development for both University departments and third-parties, and new educational facilities and student accommodation. Collectively the development would create a focus for research and learning into mental health, grouped around a new mental health hospital. The unprecedented juxtaposition of these uses is being designed to create a world class mental health campus.

The opportunity to create such a campus is nationally important and warrants strong support in the Local Plan. OHFT support the inclusion of a range of complementary uses which can inform the masterplanning process.

OHFT request that specific reference to research facilities is included within the list of acceptable uses such that the beginning of policy SPE8 reads as follows:

“Planning permission will be granted for healthcare facilities and related uses at Warneford Hospital, including any of the following complementary uses:

- *research facilities,*
- *extra care accommodation*
- *residential development, including employer-linked affordable housing and student accommodation,*
- *employment uses that have an operational link to the hospital;*
- *additional academic institutional and education uses subject to compliance with relevant local plan policies.*

Other complementary uses will be considered on their merits.”

Open space, nature and flood risk

The final part of this section expects any development affecting the former playing fields in the south-east corner of the site to mitigate any harm or loss. The currently Adopted Local Plan 2020 offers recognition that the *“loss of the sports facility is considered justified only due to the need for and benefits of new hospital development”*. No such recognition is included in the Submission Draft.

OHFT request that similar wording is reinstated to reflect the significant contribution that the development of a new Warneford Hospital would make to the vision of the Local Plan, therefore justifying the loss of the sports facility. It is well established that the existing hospital is not fit for purpose and needs to be replaced. It is not understood to be controversial that the south eastern part of the Warneford site (the former playing field) is the only suitable location. Reinstating the existing Local Plan wording would remove any uncertainty and be beneficial to public understanding of priorities on the site. It is fully acknowledged that mitigation will be required for the loss of the sports facility but wording should mirror that of the existing Local Plan and reflect that the principle of the loss is justified. The suggested wording is as follows:



“The loss of the sports facility is considered justified only due to the need for and benefits of new hospital development. Development proposals affecting the playing fields will be expected to mitigate any harm or loss in accordance with the requirements of Local Plan Policy G1.”

OHFT request that the wording in relation to a reduction in surface water is removed. The wording as drafted is not necessary and its purpose is not understood. The sensitivity of the Lye Valley SSSI is fully protected through the first paragraph in this section and there is no need for additional protection here (if that is the purpose of the statement). A drainage strategy would be required with any application which would adequately address the management of surface water, SUDs and flood risk. Therefore, we suggest the following part of the policy is removed:

~~*“Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan.”*~~

Urban design and heritage

The Adopted Local Plan 2020 makes reference to development of 3-4 storeys being likely to be appropriate as part of the redevelopment of Warneford Hospital. No such wording is included in the Submission Draft Site Allocation.

An indication of appropriate building heights is important to the evolution of the masterplan for the site and height of 3-4 storeys is necessary if the Trust’s vision for the site is to be realised. This was shown to be necessary and appropriate in our engagement with officers in 2020. Again, it would assist public understanding if this was to be clear in the wording of the Local Plan. It is important in Oxford generally, and here specifically, that optimum use is made of scarce development opportunities. Previous pre-application engagement with the City Council demonstrated that there were no constraints to 4 storey development on Roosevelt Drive and there has been no relevant change of circumstances since that time. OHFT request that reference to 3-4 storeys being considered appropriate is written into the policy. Suggested wording for inclusion in the policy, at the end of the first urban design and heritage paragraph, is as follows:

“Development of 3-4 storeys is likely to be appropriate, subject to careful massing particularly at the boundary of Warneford Meadow.”

It is also suggested that the following wording is removed from the policy text.

~~*“To minimise loss of openness on the site, further development could be focussed in the first instance towards the rear of the hospital block with redevelopment of non-listed poorer quality buildings. The most appropriate approach will incorporate green gaps between buildings of relatively low height and limited scale.”*~~

Buildings in that part of the site would indeed benefit from redevelopment but the first necessary phase of regeneration of the site is the construction of a new hospital, which can only be constructed on the available land at the ‘front’ of the site. As worded the draft Policy is unhelpful and its terms are unnecessary.



Paragraph 16 of the NPPF requires plans to “*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*”. The wording above does not provide clarity on what will be expected from a development proposal, nor what will or will not be permitted. Suggestions for phasing which are unachievable are not appropriate.

Movement and access

OHFT supports the flexibility of approach offered by this part of the policy. However, OHFT suggest a minor amendment to the second part of this section as follows:

“If the current levels of car parking are assessed as not being required, there may be opportunities for some consolidation and any freed-up site area may be repurposed for considered landscaping and more space for pedestrian use, or development. Applicants will be expected to demonstrate how the development mitigates against traffic impacts and maximises opportunities for access to the Site by alternative means of transport”.

Natural resources

The wording in the first paragraph of this part of the policy is unclear and should be redrafted such that it accurately reflects the intent of draft Policy R6 (Soil quality). The wording currently states that development on undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of peat deposits. It then states that the aforementioned may mean that harm to peat deposits on site may need to be mitigated. This is contradictory. It should be made clear that if harm to peat deposits cannot be avoided then mitigation is acceptable. OHFT’s suggested wording is as follows:

“Due to the site’s proximity to recorded peat reserves associated with the Lye Valley, and the potential for further deposits in the area, any development site layout must take account of the location of peat deposits. Any unavoidable loss should be mitigated in accordance with Policy R6. ~~any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of peat deposits in accordance with the requirements of Policy R6. This may mean that where there is the potential for causing removal of peat, site layout has been designed accordingly to protect and mitigate any harm to identified peat deposits onsite.~~”.

3 Other Policies

Vision and Strategy

Policy S1

Policy S1 (Spatial Strategy and Presumption in Favour of Sustainable Development) offers support for new development which contributes to Oxford’s national and international role in research and development on existing sites already in that use. OHFT welcome the recognition of the importance of sites such as SPE8.



Policy S2

OHFT look forward to working closely with OCC in the creation of a local design code for the Site, as per **Policy S2 (Design Code and Guidance)**. A Design code will be created to guide the development at Warneford.

Housing Provision

Policy H3

OHFT welcome the reference in **Policy H3 (Affordable Housing Contributions from New Purpose Build Student Accommodation)** to affordable housing contributions not being sought from student accommodation development where the accommodation is being proposed within a campus site.

Policy H9

OHFT support **Policy H9 (Location of New Student Accommodation)**. It is acknowledged that not all locations are suitable for student accommodation. OHFT are pleased to see that the policy identifies that student accommodation will be appropriate on sites where the allocation includes that specific use, as well as on or adjacent to existing suitable locations.

Policy H10

Similarly, OHFT support **Policy H10 (Linking New Academic Facilities with the Adequate Provision of Student Accommodation)**. OHFT are pleased to see recognition of the need to plan for the accommodation requirements when considering new build or refurbished academic institutions.

However, the part of the policy relating to the University of Oxford needs to be redrafted for clarity. As written, it is not clear whether the intention is that if, before 2028, the number of students requiring accommodation whose needs are not catered for exceeds 1,300, then no development which generates an increase in student numbers will be permitted.

Employment

Policy E1

Policy E1 (Employment Strategy) is supported, particularly the identification of the need to ensure employment land is efficiently used through the upgrading and re-use of existing buildings. The policy further supports the intensification and modernisation of Category 1 and 2 employment sites. OHFT welcome the improvements to existing employment sites allowed for by this policy.

However, OHFT suggests that recognition is made within the policy of sites that may be allocated for other uses. SPE8, for example, whilst being designated as a Category 1 employment site, is also allocated for alternative uses. The suggested wording for inclusion within the policy is as follows:



“Planning permission will be granted on Category 1 and 2 employment sites where the proposals are in accordance with any relevant site allocation in the Plan.”

Green Infrastructure

Policy G1

Policy G1 (Protection of Green Infrastructure) states that core, supporting and ‘other’ green and blue spaces are identified on the policies map through labelling as G1A, G1B and G1C, respectively. Such labelling is not apparent on the policies map and it is requested that this is addressed. However, OHFT welcome the recognition that, for supporting green and blue spaces (G1B), planning permission will be granted if harm or loss to these spaces is mitigated by re-provision, ideally on site.

Policy G3

Whilst the intention of **Policy G3 (Provision of New Green and Blue Features – Urban Greening Factor)** (‘UGF’) is supported, clarity is required. The policy as drafted states that for major applications, a UGF of 0.3 is required for predominantly residential schemes and a score of 0.2 for predominantly non-residential schemes. It then states that all other forms of development should show how UGF has been taken into account. It is assumed here that “all other forms of development” relates to minor applications but explicit wording should be included to make that clear, if indeed that is the intention. Suggested wording is included below:

~~“All other forms of development~~ All minor development – with the exception of householder applications – are encouraged to demonstrate how they have undertaken greening of their site through use of the UGF tool, though this is not mandatory”.

Transport

Policy C8

Section 7 of the Submission Draft Local Plan focuses on travel and transport in Oxford. Supporting text to **Policy C8 (Motor Vehicle Parking Design Standards)** states that permission may be refused for development where additional parking pressure would compromise highway safety or restrict the ability of existing residents to park (paragraph 7.48).

Policy M3 of the Adopted Local Plan 2020 states that there would be a presumption that vehicle parking would be kept to the minimum necessary to ensure the successful functioning of the development. OHFT supported that policy insofar that it allows for flexibility between non-residential developments and recognises that needs differ for different uses. However, the Submission Draft Policy C8 still includes the former part of the policy but prefaces it with the presumption that any vehicle parking will be for blue badge and servicing only.

OHFT does not support the inclusion of the presumption against vehicle parking as a blanket rule. Given the detail provided in the remainder of the policy, such as in relation to the redevelopment of



existing sites, or that parking should ensure functionality of the development, it is not considered necessary to include such wording in the policy. OHFT suggest that the following sentence is removed (shown as struck through):

~~“The presumption will be that vehicle parking will be for blue badge and servicing only. Any additional provision being kept to the minimum necessary to ensure the successful functioning of the development, the need for which should be demonstrated through the submitted Transport Assessment/Travel Plan.”~~

4 Conclusion

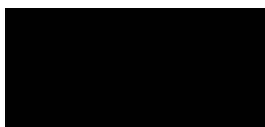
Overall, OHFT support the Site’s (Warneford Hospital) allocation as part of the East Infrastructure Area of Focus. Given the significance of the site’s unique potential, OHFT would support a more explicit policy for the site.

OHFT are committed to working collaboratively with OCC to develop a holistic, landscape-led masterplan for the sustainable redevelopment of the Site. There are some matters highlighted above, however, which we request are considered by OCC to provide clarity to the public and to positively support future development at Warneford.

We trust that these representations are helpful and request the opportunity to engage with your team over the detail of the policy wording.

Should you have any questions about these representations, or require any additional information, please do not hesitate to contact my colleague, John Rhodes [REDACTED] or myself.

Yours sincerely



Becky Hartley
Senior Planner