

PLANNING STATEMENT
ON BEHALF
CLARENDON LP GP LIMITED

CLARENDON CENTRE
52 CORNMARKE STREET
OXFORD
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1.0 INTRODUCTION AND PROPOSAL

- 1.1 The Clarendon Centre is a large, commercial scale, five-storey property in the centre of Oxford. It is currently in main use as a covered shopping mall on the ground floor, with offices over. It has frontages to Cornmarket Street, Queen Street and Shoe Lane.
- 1.2 The proposal involves the wholesale redevelopment of the property, involving refurbishment of some of the existing built structure, part demolition and new built development too, in a three phased scheme. Ultimately, the redevelopment will deliver a largely new building in its appearance comprising a mix of uses, with retail, offices, student accommodation and research and development laboratories.
- 1.3 The proposal also involves the removal of the existing roofed, enclosed mall, and its replacement by a series of new open-air streets through the redeveloped site, linking the site in from Queen Street, Shoe Lane and Cornmarket Street, and with a completely new public thoroughfare created through from Frewin Court.
- 1.4 At the centre of the redeveloped site, a new public square will be provided, landscaped with tree planting and areas for the public to sit and for outside seating to be provided in connection with the new cafés/restaurants that will front onto the square. Leading off this public square, a free lift access will also be provided to a new rooftop level where a café facility with terrace will allow views out across Oxford to be enjoyed.
- 1.5 This Statement sets out a reasoned justification as to why this application should be permitted by reference to the development in relation to the prevailing planning policy framework and the relevant planning considerations that flow from the site and its context.

2.0 THE PHASED DEVELOPMENT

- 2.1 As stated, the redevelopment of The Clarendon Centre is set to take place in three phases.

Phase 1

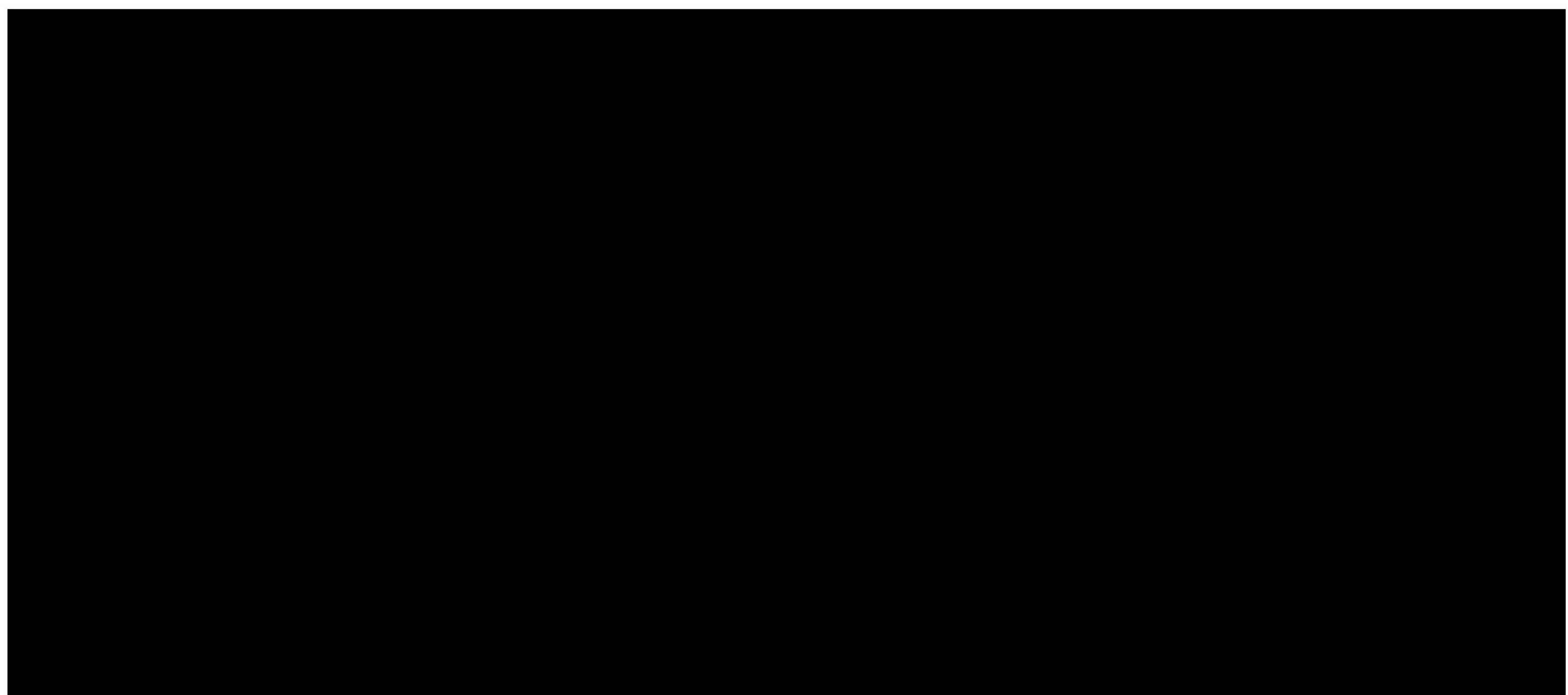
- 2.2 This consists of the main demolition works on site that involve the removal of the entire mall roof, along with a large part of the Queen Street mall and the Shoe Lane atrium. Essentially, this first phase of the redevelopment works will see the Clarendon Centre turning from an enclosed, internal mall, to an open space environment. This phase will also see the creation of the new public square. In use terms, this phase will also see the delivery of much of the new retail space and the research and development laboratory building with its ground floor space café.

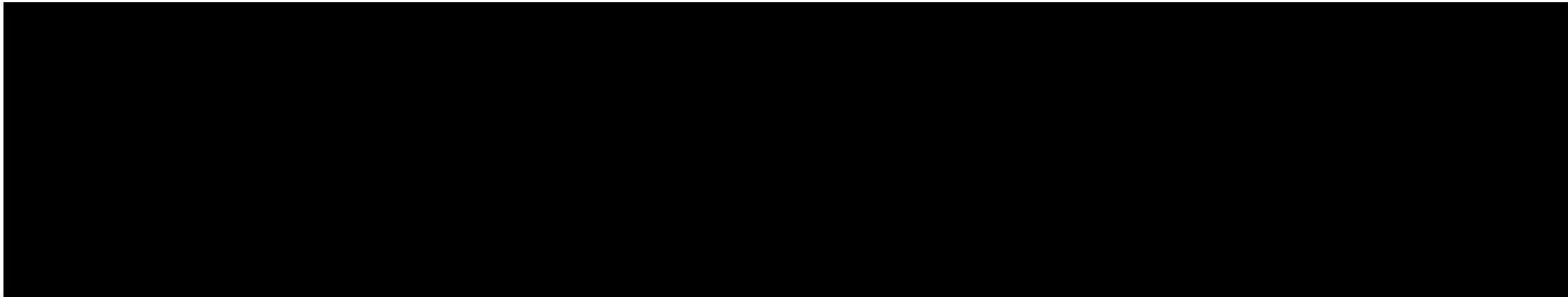
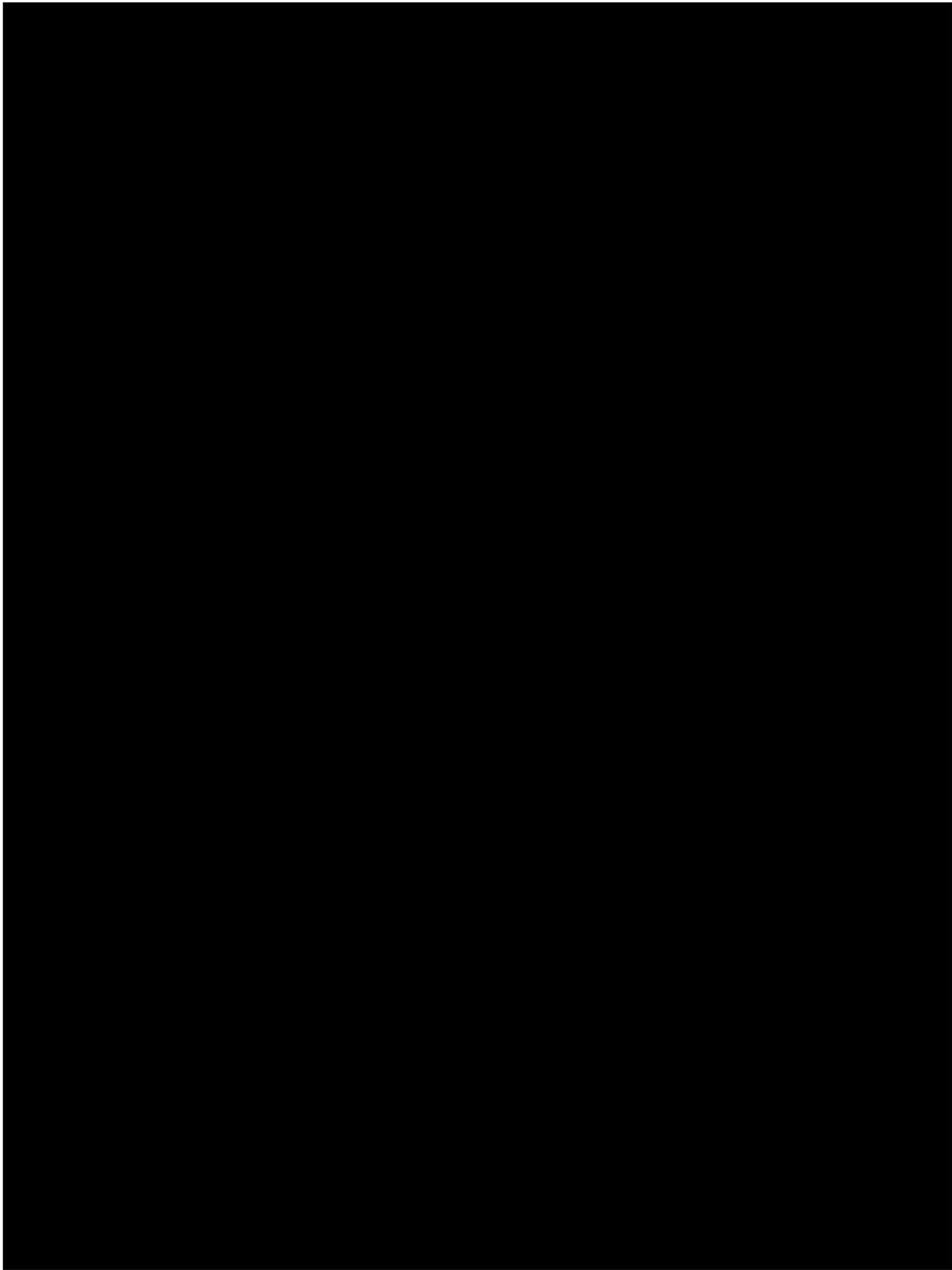
Phase 2

- 2.3 This phase will principally see the delivery of the proposed student accommodation element and the refurbished Clarendon House offices, along with further retail units in the NE corner of the site, plus a new pedestrian route through to Frewin Court and the completion of the new square.

Phase 3

- 2.4 The final phase of development will see the completion of the proposal with the remainder part of main demolition works on site and leading to the principal creation of new office space within a new main building fronting onto Cornmarket Street and the remaining new retail units.





4.0 RELEVANT PLANNING POLICY FRAMEWORK AND MAIN PLANNING CONSIDERATIONS

4.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications and appeals to be determined in accordance with the policies of the Development Plan unless material considerations dictate otherwise.

4.2 The Development Plan for the area comprises the Oxford Local Plan 2036 and I therefore draw upon the relevant policies of that Plan in the consideration of this Statement. First though, a consideration of the relevant national level policies.

Government Planning Guidance

4.3 Government guidance as a material consideration relevant to the consideration of this application can be found in the National Planning Policy Framework (NPPF) February 2019.

4.4 At paragraph 1 the NPPF sets out the Government's planning policies for England and how they are expected to be applied.

Achieving Sustainable Development

4.5 The NPPF at paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 continues by stating that there are three overarching objectives to sustainable development: economic, social and environmental, and that these objectives are interdependent and need to be pursued in mutually supportive ways and give rise to the need for the planning system to perform a number of roles:

- **an economic role** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **a social role** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **an environmental role** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.6 It is clear that if the proposal is looked at across those 3 fronts that it complies with its salient tests. It will make a positive contribution to the local economy both during the construction phase through the creation of many local jobs in the short term and thereafter in the longer term by ensuring that a mix of new uses including offices, retail, R&D and student accommodation is all delivered right into the heart of the city centre. In social terms the provision of a new square, the re-opening and creation of new streets through the site, including a new pedestrian route through to Frewin Court and the introduction of a new publicly accessible rooftop all combine to positively enhance the public realm experience that would be derived, and which amount to a significant package of positive social benefits of the scheme. In environmental terms, the site is in the right place in so much that it relates directly to the existing developed area of Oxford, makes a most efficient reuse of an existing site in an accessible, urban area and improves the energy efficiency too of the existing buildings over the site. These considerations all amount to clear and positive environmental benefits that derive from this proposal.

- 4.7 I therefore consider the cross economic, social and environmental benefits are clear and obvious and the proposal is therefore rightly to be defined as a sustainable form of development.
- 4.8 Paragraph 10 of the NPPF identifies that: “at the heart of the Framework is a presumption in favour of sustainable development. Councils are expected to take a positive approach in their consideration of applications that reflect the presumption in favour of such developments.

Presumption in Favour of Sustainable Development

- 4.9 Acknowledging then as I say that at the heart of the NPPF is a presumption in favour of sustainable development, paragraph 11 of the NPPF echoes paragraph 10 and sets out that both plan-making and decision-taking should apply a presumption in favour of sustainable development.
- 4.10 It is submitted herein that the range of identified significant benefits that accrue from the proposal plainly represents a wholly positive and sustainable development opportunity overall for the local area and the city centre and Oxford as a whole, that should properly be supported.

Pre-Application Engagement and Front Loading

- 4.11 Paragraphs 39-46 of the NPPF refers to the role of pre-application engagement with both the local planning authority and with the local community. It sets out that early engagement has significant potential to improve the effectiveness and efficiency of the planning application system for all parties. Good quality pre-application discussion enables better co-ordination between public and private resources and leads to better outcomes for the community. In this case, the applicant has engaged in an extensive scheme of pre-application engagement with all the relevant local bodies. In the first place, the Council were consulted on an initial pre-application basis in order to explain and set out to them the proposals at hand. That led to early discussions and meetings between the parties which were in turn then subsequently formalised by way of a structured Planning Performance Agreement (PPA) entered into with the City Council. That in itself led to a long series of further, formal pre-application

meetings and discussions, through the PPA process, leading up to the submission of the application. The draft scheme was also submitted before two rounds of expert professional scrutiny via the Oxford Design Review Panel process, with Historic England included in that process too. Oxfordshire County Council in their role as local highway authority were also separately consulted. A comprehensive public consultation campaign was undertaken in addition which included the creation of a website, a round of newspaper adverts, a display board placed in the Clarendon Centre itself, social media advertising, a public virtual presentation of the scheme, and a series of individual virtual presentations with local stakeholders including amenity groups like the Oxford Civic Society and the Oxford Preservation Trust, and with representatives of neighbours to the site. Overall, this was a most extensive pre-application process of engagement and which is set out in full detail in the accompanying Statement of Community Involvement report.

Determining Applications

- 4.12 Paragraph 47 of the NPPF sets out that “planning law requires that applications for planning permission be determined in accordance with the Development Plan, unless material considerations indicate otherwise”. In this context, I am not aware of any material considerations that arise here that would come to outweigh the clear presumption in favour of the proposal, which is a defined sustainable form of development and compliant with the relevant provisions of the Development Plan (as detailed below).

Building a Strong, Competitive Economy

- 4.13 The NPPF at paragraphs 80-82 require that planning decisions in relation to business proposals should place ‘significant weight’ on the need to support economic growth and productivity, taking into account both local business needs and opportunities for development. This proposal plainly goes towards that provision with the inclusion of new, high quality offices, state of the art research laboratories, plus an enhanced retail offer including bars, cafés and restaurants. All of this out of a poorly performing existing commercial centre and a rather tired, economically obsolete development.

Ensuring the Vitality of Town Centres

- 4.14 The NPPF at paragraph 85 states that planning policies and discussions should support the role that town centres like Oxford play at the heart of their local communities, by taking a positive approach to their growth management and adaptation. It goes on to set out that planning policies should assist to promote the long-term vitality and vibrancy of town centres by allowing them to grow and to diversify in a way that can respond to rapid changes in the retail sector, and to allow a mix of uses, and which can include residential. The proposal at hand is plainly the very sort of case that the NPPF envisages here, with an outdated and inefficient building, delivering an unviable commercial offer brought up to date, made more efficient all round and providing for a range of new, quality commercial and student accommodation, in the centre of Oxford.

Promoting Healthy and Safe Communities

- 4.15 Paragraphs 91 and 92 of the NPPF set out between them that planning policies and discussions should aim to achieve healthy, inclusive and safe places and that this can be achieved in a number of ways. It includes through the promotion of social interaction, providing opportunities for people to meet one another and cites examples of mixed-use developments and street layouts which facilitate for ready pedestrian use and connections, including too the creation of high-quality public spaces which encourage the active and continual use of public areas. The proposal at hand would deliver a range of such spaces indeed. There is a new public square created, which creates opportunities for public dwell time and social interaction within it; interesting new public thoroughfares constructed through the development with a street layout pattern that connects the site to the wider city centre public realm on a 24/7 basis (compared to the current closed off and inaccessible nature of the Clarendon Centre during evening and long weekend periods); and the introduction of a publicly accessible rooftop realm that will allow the public new access to an area of the site where they can benefit from the fresh air at a heightened aspect and pause to enjoy the views out across the city. All of these matters go to the very heart of the NPPF's directive here to improve the general health and well-being of the community at large.

Making an Effective Use of Land

- 4.16 Paragraph 117 of the NPPF makes clear that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses too, while safeguarding and improving the environment and ensuring safe and healthy living conditions. It specifically encourages mixed use development schemes in urban areas, particularly where a net environmental gain accrues. Once more, across all of these counts, the proposal at hand could not be more appropriate. Here, existing buildings are refurbished and extended to provide a mix of improved commercial and student accommodation uses, while at the same time delivering positive environmental gains directly to the energy efficiency of the resultant new buildings themselves and in broader terms, to the enhancement of the local public realm. All precisely as the NPPF directs.

Achieving Well-Designed Places

- 4.17 Paragraph 124 of the NPPF provides that “good design is a key aspect of sustainable development, creates better places to live and work and helps make development acceptable to communities”. The submitted scheme has been through a very long and interactive design process, involving several redesigns at all stages of the evolving scheme, aimed to reflect the various consultation inputs, prior to its submission. All based too on a great deal of important and constructive dialogue with the City Council’s officers (planning, heritage and urban design), along with that through the ODRP process in addition. This has resulted in a finished building outcome that is submitted to make overall for an entirely appropriate design solution to the site, of a very high-quality appearance and which at the same time positively enhances the built context and visual aspect of this part of the city centre. In addition, and of significant importance to local placemaking and to creating safe and inclusive environments, the introduction of the new public square, the creation of new streets through, and the design concept of ‘sticky-streets’ in the new frontages provided turns the new Clarendon Centre into a more accessible and welcoming place and directly assists to make the new streets and those generally in the vicinity a safer place and a more permeable and attractive public place to be. The reader is referred to the accompanying Design and

Access Statement for full consideration of the design rationale and background contextual analysis that sits behind this proposal.

4.18 The NPPF at paragraph 127 requires that planning policies and decisions should aim to ensure new developments deliver high quality schemes, judged across a range of fronts. Those cited below are deemed of relevance in the consideration of this application:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to work, live and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

The proposed scheme is carefully designed in its overall concept to accord with all of these aims it is submitted.

Conserving and Enhancing the Historic Environment

- 4.19 Paragraphs 184-202 of the NPPF require that local planning authorities, in their determination of planning applications, should take account of, amongst other things, consideration to the impact a new development has to the significance of any designated heritage aspect that may be affected by the proposal, and the desirability of new development making a positive contribution to local character and distinctiveness. This proposal now arises as a clear opportunity to enhance the existing buildings as a result of the carefully considered and well executed high-quality scheme of design, that has been heritage led indeed, and which makes a clear and positive contribution to local character and distinctiveness, as required here by the NPPF.

Local Level Policies

- 4.20 There are also a raft of locally based policies contained in the Oxford Local Plan (OLP) that work between them towards the proper consideration of this proposal.

Presumption in Favour of Sustainable Development

- 4.21 Policy S1 of the OLP sets out that the Council will take a positive approach to new development proposals and which reflects the presumption in favour of sustainable development contained in the NPPF. Planning applications that accord with the OLP will be approved without delay, unless material considerations indicate otherwise. In this case, it has already been established above that the proposal comprises a defined form of sustainable development and the principle of the scheme at least must be beyond any reasonable dispute. In the considered circumstances of this case, it is submitted that the Council should reasonably approve this planning application without any delay.

Efficient Use of Land

- 4.22 Policy RE2 of the OLP expects for new development proposals to make an efficient use of land and best use of available site capacity. The proposal plainly goes directly to the heart of this policy and looks to rework and reuse

the existing building structure, wherever possible, in a city centre location, and produce what is in effect a new building in overall appearance terms out of it all. This reworking also includes the provision of a new mix of uses across the existing site, and includes new buildings delivering student accommodation, upgraded office space, a research and development facility, along with an enhanced ground floor retail use offer. It also includes the provision of significant new areas of publicly accessible space in the form of an open to the air central square, with new streets and thoroughfares running off it, out to Queen Street, Cornmarket Street and Shoe Lane, along with the creation of an entirely new public link through to Frewin Court. In addition, the proposal also opens up the roof of the new development to public access too. All of these new uses and new areas of public space delivered out of and within the existing Clarendon Centre demise and the available site area. All too delivered in an appropriate and proportionate manner throughout in relation to the existing site context. This is a scheme, more so than any other in the centre of Oxford in recent times, that genuinely and most skilfully, looks to make the very best of its available site capacity in terms of delivering both new building structures and new uses, while at the same time introducing such a range of new and dynamic public spaces into the heart of the city. The terms of Policy RE2 are met and exceeded indeed in the scope of this proposal.

Ensuring the Vitality of Centres

- 4.23 Policy V1 of the OLP is a permissive policy in its nature in so far it supports new development in the city centre, such as retail and office space provision and where that development contributes to the maintenance and enhancement of the vibrancy and vitality of Oxford city centre. In this case, a range of new uses are provided throughout the development, with a new and improved active retail-based frontage, anchoring the scheme at ground floor level, and with a range of uses introduced above to the upper floors. The new ground floor space itself being centred around a landscaped public square, with opportunities for informally sitting around it and/or sitting outside of a café fronting onto the square. Oxford has a dearth of publicly accessible spaces and more precisely squares in the city centre, and the provision here of a new, public square must surely be seen as a significant, new public realm facility and

a significant planning benefit of this proposal in terms of positively assisting the vibrancy and vitality of the city centre.

- 4.24 In the same manner, the introduction of new public access to the rooftop of the new Clarendon Centre and the opening up of brand new views out from the city centre, must also be seen as a significant benefit of the scheme, again in terms of ensuring and assisting the vitality of the Oxford city centre as a whole. The rooftop views, free to view indeed (compared to the majority of other city centre views which are viewed at charge) are likely bound to become a major draw to the city and add to its overall vibrancy.
- 4.25 The mix of uses delivered to the site, with enhanced employment opportunities in the retail, office and research and development facilities, along with the inclusion of a student accommodation element, will all contribute to the attractiveness and use of the site and add to the vitality of the city centre.
- 4.26 Indeed, it is important to bear in mind that at the present, the Clarendon Centre is shut to public access into the evening and for parts of the weekend, whereas the proposal opens up this most central part of the city for the first time in many, many years to 24/7 public access through it. Instead of a 'dead' central site, the proposal will open up streets through it and introduce uses into it, that will combine to produce an active and attractive set of spaces.
- 4.27 A combination of all of these factors come together to deliver a great range of benefits, to both the environment of the city centre and to the social and economic well-being of the city centre too, that are firmly judged to assist most positively the long-term sustainability of the city centre and which will contribute to making it an attractive place to work in, to live in and to invest in, all of which assists with vibrancy and vitality of the city centre, as policy dictates. Indeed, these findings are endorsed in the accompanying Town Centre and Retail Assessment report which goes to these considerations in further detail. Suffice to say here, that assessment finds that the mix of uses proposed within this scheme and the range of benefits they deliver, are all fully compliant with the terms and requirements of Policy V1.

Shopping Frontages in the City Centre

- 4.28 Policy V2 of the OLP seeks to ensure an appropriate mix of uses (identified through percentages allocated to uses) within designated shopping frontages across the city centre. The Town Centre and Retail Assessment report mentioned above, also assesses the scheme in greater detail here too with specific regards the relevant terms of this related policy and full regard should be had to that report in the proper consideration of this policy. Once again, suffice to set out herein the shorter version of that full assessment. The Clarendon Centre finds itself within the defined primary shopping frontage of the city centre. Within the primary frontage, the policy states that permission will be granted for Class A1 (retail) uses or Class A2-A5 (financial services and professional, restaurant, pub and takeaway) uses where the proposed development would not result in the proportion of units at ground floor level in Class A1 use falling below 60% of the total number of units within the defined primary shopping frontage. The Council's most up to date retail survey (July 2020) indicates that the percentage of A1 uses at ground floor within the city centre primary shopping frontage is at 72.8%. The net effect of the proposal in this case is that with the proposed scheme completed, in overall city centre primary shopping frontage terms, this would see the percentage of A1 uses drop slightly to 69.19% and A1/A3 when taken together sitting at 72.43%. Given these figures, and whichever way they are looked at, the percentage of A1 uses would still remain readily in excess of the 60% minimum policy threshold. Consequently, with the set threshold remaining unbroken through the completion of this proposal, then the submitted scheme is plainly compliant in relation to Policy V2 of the OLP.

High Quality Design and Placemaking

- 4.29 Policy DH1 of the OLP seeks a good and high-quality standard of urban design in new developments which creates or enhances local distinctiveness. The attendant Design and Access Statement sets out in full the careful and rigorously considered process of design rationale that has led to the submitted overall scheme of design and how that scheme has been refined through the long pre-application process and in collaborative discussion with the Council and the Oxfor Design Review Panel. The newly formed group of buildings that

will comprise the new development, will appear as distinctly different from the current Clarendon Centre, in that they will operate as separate uses around newly formed sections of public realm that will come to tie all of these uses together. This will deliver a more contextual design to the new development overall, related to an extension of the existing street structure in effect. Thus, it introduces a prioritisation of the public urban environment, allowing people to wander through and interact with the newly formed mix of uses and the new environment of the Centre. This all in sharp, marked contrast to the closed and sterile environment of the Centre as it currently presents. In so doing, this all contributes most positively to local placemaking and to the quality of the environment delivered.

Views and Building Heights

- 4.30 Policy DH2 of the OLP seeks to retain identified significant views, both from within and without Oxford, in particular in relation to Oxford's historic significance. In this regard, a visual impact assessment has been undertaken as an integral part of the overall design process that assesses the proposal in relation to the main identified views. A full analysis of all of the relevant identified views is contained within the accompanying Heritage Report. In short, that report discusses the verified views provided and which have allowed a proper assessment of the impact of the development. It sets out that in the wider view over the historic core of the city, which is how the main views are for the main part experienced, the development would be noticeable, but not obtrusively so and would not compete with other more prominent features in the view. Indeed, in some of the views, it would be difficult to discern the proposed development at all over what currently exists. In some views too, from Carfax Tower in particular, there would be a noticeable change, but for the better in the nature of the roofscape here. The report also importantly recognises for context, that the proposed development only in fact occupies a relatively small part of the overall view of the city's roofscape and that taking into account that the form, scale and siting of the proposed roof area and use of materials has been carefully developed to avoid visual obstruction and visual competition, then the conclusion is that the effect of all of this is to preserve the essential character of the city's roofscape. Indeed, the overall analysis of the verified views and their setting demonstrates that the proposed development

would not result in harm to significance of those views. That is as the policy requires.

Designated Heritage Assets

- 4.31 Policy DH3 of the OLP states that planning permission will be granted for development that respects and draws inspiration from Oxford's unique historic environment and where it responds positively to the significant character and distinctiveness of the heritage asset and the locality. The site stands within the Central (University and City) Conservation Area and within the setting of some listed buildings in the vicinity. The accompanying Heritage Report considers all of these heritage related matters in full detail. The conclusion to that report is that the proposals will lead to the creation of a new chapter in the history of the site and which will reshape its' identity without erasing its' history and the meaning it holds for local and wider communities. It acknowledges that the proposals will involve inevitable change, but that the repurposing of the existing buildings retained and the introduction of new built forms, will between them positively engage with Oxford's urban fabric and history. It also acknowledges that there may be some small level of harm produced by the proposals, but that any such harm would be less than substantial and at the bottom end of that scale of harm, and therefore entirely acceptable in proper context. At the same time, that the proposed scheme will deliver numerous public benefits too, including specifically heritage related benefits, that would in themselves go towards outweighing any level of harm identified. Consequently, in heritage terms, the proposals are judged to be entirely acceptable.

Managing the Impact of Development

- 4.32 Policy RE7 of the OLP is an all-encompassing policy with regards to matters of general amenity (the attractiveness of a place) and how such issues can impact upon the quality of life or those who live, work and visit Oxford. The proposed scheme would come to produce an architecturally pleasing new development overall and which, it is submitted, would positively enhance the general quality and attractiveness of the public realm experience of this part of Oxford. This includes the provision of a new public square with open areas for sitting out within and around it; the creation of new and enhanced public thoroughfares

through the site from all directions; plus the creation of a new public rooftop viewing opportunity. These comprise a raft of significant amenity benefits that it is difficult to argue other than that the proposal in these terms would create a markedly enhanced level of improved local amenity, all round, just as the terms of the policy envisage.

Shopfronts and Signage

- 4.33 Policy DH6 of the OLP concerns itself specifically with new shopfronts and associated signage/advertisements and requires that new design responds to and positively contributes to the character and design of existing buildings and the context of their surrounds. In this case, the proposal introduces a whole series of new shopfronts throughout the development, and creates new retail-based frontages on the 'sticky-streets' principle. This all adds a very positive visual interest to the ground floor retail environment (a significantly enhanced impact unarguably set against the shopping environment currently in place at the site) and will add to and contribute to the quality of the local environment in this central part of the city centre and enhance its overall built and visual character. It is submitted, and compared certainly to what exists, that the proposal would markedly improve and significantly enhance the retail experience of this part of Oxford and the overall visual amenities of the local streetscene.

Employment Sites

- 4.34 Policy EH1 of the OLP concerns itself with existing employment sites and looks to promote the intensification, modernisation and regeneration of such sites for increased employment use purposes. The Clarendon Centre is identified in policy as a Category 2 site wherein planning permission will not usually be granted where a loss of employment space arises. In this case, with the introduction of a more intensively used site, across a range of employment related uses (offices, R&D, retail and even student accommodation) and all set within an increased, useable building floorspace, then the provision of continuing and indeed newly otherwise employment generating uses on the site could not be more appropriate to the requirements of the policy. Indeed, in terms of modernisation of employment uses as the policy in part requires, the

inclusion of new R&D lab space here in the heart of the city centre (compared to the location of existing other such provision away from the city centre) must properly be seen as a dynamic and innovative employment provision that comes to sit positively alongside Oxford's status as a world leading University city renowned for its academic and scientific research.

Provision of New Student Accommodation

- 4.35 Policy H8 of the OLP deals with the provision of new student accommodation in Oxford, and limits that provision to certain locations only. Those identified locations include within the city centre and on sites adjacent to existing university or college campus sites. In this case, the Clarendon Centre stands both within the city centre and adjoins the next-door Brasenose College campus. Indeed, the intent is for the new student accommodation to be provided directly for Brasenose students. Therefore, in locational terms, the proposal to include a new student accommodation facility is plainly a fully policy compliant element of the overall scheme. At the same time, such dedicated student accommodation provision here relieves pressure on the City's private housing stock elsewhere, allowing it to remain/return to conventional residential use and to reduce the need to stay in/change into student use.

Delivering Affordable Homes

- 4.36 Policy H2 of the OLP includes the requirement for the provision of affordable housing from all new student accommodation proposals of 25 or more student units and looks to secure that provision by means of a financial contribution. The contribution is based on a formula that equates to any new student accommodation related floorspace being multiplied by £188.60 per square metre. The final figure here is likely a large and significant contribution towards the provision of affordable housing in the city and another major planning benefit of this proposal that has a direct gain to the wider social and community betterment of Oxford as a whole.

Promoting Walking, Cycling and Public Transport

- 4.37 Policy M1 of the OLP sets out that planning permission will only be granted for development that minimises the need to travel and is designed in a way that promotes access by walking, cycling and public transport. In this case the site could not be more suitably located being set within the middle of the city centre where ready access exists to the full range of public transport options and where all facilities and services within the city centre are available on foot in relation to the site. In addition, the site's Shoe Lane entrance also happens to stand alongside one of the Council's designated local cycle connection routes running along New Inn Hall Street. The Clarendon Centre could not be better located in terms of the requirements of this policy.

Bicycle Parking

- 4.38 Policy M5 of the OLP sets out minimum cycle parking standards for new development (as set out in related Appendix 7.4 of the OLP). Those standards require 1 cycle space per 113m² of A1 retail use, 1 cycle space per 40m² of A3-A5 food and drink use, 1 space per 90m² or 1 space per 5 staff or other people for the office use and at least 4 spaces for every 4 student bedrooms in the student rise, plus a 10% public provision on top. In this case that all combines to amount to a cycle space requirement of 305 spaces for the proposed floorspace involved and with an additional 10% (32 spaces in this case) added for public spaces provision. All of the required spaces are shown provided within and throughout the site in various locations, both privately provided (for the staff working at the site and for the student users too) and publicly provided via the Frewin Court access area. Thus, the proposal is then fully policy compliant in all of these standard terms.

New and Enhanced Green and Blue Infrastructure Network Features

- 4.39 Policy G8 of the OLP deals with biodiversity enhancements and new landscaping as part of any new development. In this case, a Landscape Report supports the application and sets out a range of landscape related measures proposed to be introduced as an integral part of the overall scheme design. They include substantial planting in and around the new square, with an

element of water included in the layout, a feature tree in the Cornmarket Street mall and large areas of green, planted rooftop. These biodiversity elements are a clear gain in comparison to the relatively sterile building structure currently in place.

Sustainable Design and Construction

- 4.40 Policy RE1 of the OLP requires new development to incorporate sustainable design and construction principles in their production. An Energy Report accompanies this application and sets out in full detail the range of sustainable measures incorporated into this proposal. They include, importantly, an overall greater than 40% carbon emission reduction across all 3 phases of the proposed development, achieved through a combination of various passive and energy efficient measures. The report also details how the proposed development is targeting a BREEAM excellent rating for the majority of the proposals within the development, with the exception of the 'shell only' retail units which are targeted as Very Good (due to limitations in the BREEAM methodology and explained fully in the report). It is certainly clear from the report that the proposal at hand has plainly been designed from the outset with those measures firmly in mind and that the proposal will comprise an eminently sustainably designed form of development.

Archaeological Remains

- 4.41 Policy DH4 of the OLP sets out that on sites which are suspected or known to have archaeological deposits, an appropriate archaeological assessment should be submitted with any planning application. In this case, early discussions were held with the Council's own Archaeologist and an appropriate strategy agreed with him to deal with the known likely (previous development at this site has revealed archaeological finds) archaeological deposits at the site. This is all set out in the submitted and agreed Archaeological Desk-Based Assessment and Archaeology Mitigation Strategy documents that accompany this application.

Protection of Existing Green Infrastructures Features

- 4.42 Policy G7 of the OLP deals with the protection of existing green features on or around a site, including trees. In this case, whilst there are no trees within the proposed site area, there are 3no. individual trees and a small group of trees adjacent the site. In this regard, the accompanying Arboricultural Report Details that all of those trees will be retained through the proposed development and that none of those trees will be adversely affected to any degree. In addition, the proposal includes the provision of around 25no. new trees to be planted, predominantly within the new square. Plainly then a clear net gain of new trees generated by the proposed development and all of the existing trees around the site retained at the same time.

Protection of Biodiversity and Geodiversity

- 4.43 Policy G2 of the OLP seeks to ensure that any new development which results in a net loss of sites and species of ecological value will not be permitted. The Ecological Appraisal which accompanies this application covers these considerations and sets out that when the mitigation measures set out in the report are fully implemented, that there is then no potential for the redevelopment of the site to cause any significant ecological impacts on designated sites, habitats or species, or cause breaches of legislation relating to wildlife and nature conservation matters. In fact, the proposed scheme has the potential to enhance the site ecologically through the provision of a green roof habitat and the installation of bird boxes, all in line with the requirements of Policy G2 of the OLP.

Air Quality

- 4.44 Policy RE6 of the OLP seeks to control the impact of new development on air quality and that for all new major proposals the application must be accompanied by an Air Quality Assessment (AQA) report. This submission is a major category application and is accompanied by the relevant AQA report. The report details the potential air quality impacts associated with the construction and operation of the proposed mixed use development and its findings conclude that there are no adverse impacts relating to air quality

deriving from the proposal and that therefore the scheme complies with the terms of policy RE6.

Sustainable and Foul Drainage, Surface and Groundwater Flow

- 4.45 Policy RE4 of the OLP requires that all new development proposals manage surface water through sustainable drainage systems (SUDS) or techniques designed to limit run-off and reduce the existing rate of run-off on previously developed sites. In these regards, a Below Ground Drainage Strategy is produced to support the application. This strategy aims to maximise blue roof storage potential on new build structures and to make additional below ground storage beneath the new square. This strategy demonstrates too how flood risk will be reduced both on and off-site as a result of the proposed development. This is precisely as Policy RE4 prescribes.

Noise and Vibration

- 4.46 Policy RE8 of the OLP Sets out that planning permission will only be granted for development proposals which manage noise to safeguard or improve amenity, healthcare and quality of life. An Acoustic Report is produced to support the application in these regards. It sets out, inter alia, that a range of proposed noise attenuation measures are to be utilised in the proposal eg. acoustic double glazed window units, acoustically rated trickle vent systems et, and with the conclusion to the report that noise issues in connection with the proposal are not expected to pose any obstacle to the proper grant of planning permission.

Health, Well-Being and Health Impact Assessments

- 4.47 Policy RE5 of the OLP sees the promotion by the Council of healthy and vibrant communities and that any new development proposals are expected to help deliver these aims through the development of environments which encourage healthy day-to-day lifestyles. Major development proposals, such as this, are required to complete and submit a Health Impact Assessment proforma in order that the Council can assess these matters for themselves. A duly completed

HIA form is submitted and demonstrates the scheme's compliance with these aims, across all of the relevant criteria.

5.0 SUMMARY & CONCLUSIONS

5.1 The Clarendon Centre currently presents a rather tired and outdated premises and a comparatively unattractive retail experience. It is a premises that is shut off from public access into the evening and for large parts of the weekend and does not contribute in those terms in a positive sense to the city centre of Oxford and the enjoyment of it as place to visit or work.

5.2 By contrast, a very exciting opportunity now arises through the proposed redevelopment scheme and which is set to transform this site at the very centre of the city and the area around it.

5.3 A range of significant public benefits will accrue from this proposal:

- A brand new publicly accessible and landscaped square in the heart of the city;
- The introduction of new streets through the site, integrating the site with its surrounding context;
- The creation of a brand new public link through to Frewin Court, opening up a further new public space;
- A lift access up to the rooftop of the new building, free to use, so that views across the city can be enjoyed;
- A significant financial contribution towards the provision of affordable housing in the city;
- The creation of a range of new employment opportunities across a broad sector of workplace streams, and;
- The opening up of this central part of Oxford to 24/7 public access for the first time in many years and creating a new central hub of interest and user experience.

5.4 The overall design approach taken to the redevelopment scheme is submitted to enhance the character and appearance of this part of the central

conservation area and improve the setting of this site in its surrounding context in so doing.

- 5.5 It has been demonstrated through a careful analysis of views in relation to Oxford's historic skyline, that the proposed overall height and mass of the new development would sit appropriately within the identified views and not detract from them to any significant degree.
- 5.6 It has also been shown that in overall heritage impact terms, whilst there may be some low level of heritage harm identified, that any such harm is less than substantial and is more than outweighed in any event by the range of benefits, both public and directly heritage related, that the proposal delivers.
- 5.7 Further overall, the scheme represents an eminently sustainable form of development, the like of which a raft of both national and local level planning policy positively permits for and encourages.
- 5.8 It is, in short, a scheme that will have a significant and transformative impact at the core of Oxford's centre.
- 5.9 Accordingly, and for all of the reasons set out above, it is submitted that this proposal should rightly be supported and granted the planning permission herein applied for.