



CHARTERED TOWN PLANNERS

**PLANNING STATEMENT (incorporating
Affordable Housing Statement)**

**Demolition of no's 17 and 17b Between Towns
Road and Cowley Conservative Club, Between
Towns Road**

**Erection of building of three, four and five storey
building incorporating 206 student study rooms
(including 7 DDA compliant rooms and 11
studios), indoor and outdoor communal space,
bin and bicycle storage and landscaping**

On behalf of Cantay Estates Ltd

January 2021

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1.0 INTRODUCTION

- 1.1.** This Statement has been prepared by JPPC Chartered Town Planners in support of an application on behalf of Cantay Estates Ltd seeking planning permission for the demolition of no's 17 and 17B Between Towns Road and the Conservative Club at no. 19 and their replacement with a building standing three, four and five storeys in height to provide a total of 206 student study rooms, with internal and external communal facilities, an exhibition space at ground floor level together with bin and bicycle storage and landscaping.
- 1.2.** The application is accompanied by full plans and elevations prepared by Penwarden Hale Architects along with the following documents:
- Design and Access Statement (Penwarden Hale Architects);
 - Drainage Strategy (Stantec);
 - Ecological Assessment (Bioscan);
 - Archaeological Desk Based Assessment (Southampton Archaeology Unit);
 - Phase 1 Ground Contamination Assessment (Stantec);
 - Daylight and Sunlight Assessment (ERS Consultants);
 - Air Quality Assessment (Aether Consultants);
 - Energy and Sustainability Statement (ERS Consultants);
 - Heritage Impact Assessment (JP Heritage);
 - Noise Exposure Assessment (ERS Consultants);
 - Arboricultural Impact Assessment (Sylva Consultancy);
- 1.3.** The application has been the subject of pre-application dialogue with Oxford City Council as well as the subject of a formal design review. The proposal has also been the subject of pre-application consultation with local residents. The scheme has particularly evolved since the withdrawal of an application for a proposal of a similar scope and scale early in 2020, with significant input from the Council's Planning and Urban Design Officers.
- 1.4.** The proposal makes an appropriate and sustainable use of the site that delivers much needed student accommodation, which has its own role to play in meeting the need for housing in the City whilst redeveloping a site that currently detracts from the appearance and character of the wider area, which is earmarked for future change within the Council's recently adopted Local Plan. It offers improvements to landscaping and delivers a building which is well designed and energy efficient.

2.0 SITE CONTEXT

- 2.1.** The application site is a holding measuring approximately 3,100sqm in size, located on the southern frontage of Between Towns Road within Cowley District Centre at the junction of Between Towns Road and St Luke's Road. The whole of the site is included on Oxford City Council's Register of Brownfield Sites.



2.2. The site is roughly square in shape and has wide frontages to both St Luke's Road and Between Towns Road. No's 17 and 17b are two-storey commercial buildings – no 17 has a bookmakers at ground floor level with a 2-bed flat on the floor above (17a) whilst no. 17b has a barber at ground floor, with a single-bedroom flat at first floor level. These buildings are visible in the photograph below, taken from the northern side of Between Towns Road.



2.3. Visible on the right of the picture and also within the application site area is the Cowley Conservative Club, a partly two storey and partly single storey building. Historic mapping of the locality appears to indicate that the building originated in the 1920's or 1930's but it has been significantly enlarged and altered. The extent to which the building has been enlarged is best appreciated from St Luke's Road.



- 2.4.** As the photograph above illustrates, the rear of the building comprises an amalgamation of single and two storey enlargements which are of no design quality whatsoever and the area behind the building is merely a concrete forecourt, with a terrace of 11 disused lock-up garages at the south-eastern boundary of the site.
- 2.5.** To the south and east of the site is an area of two-storey residential development, with semi-detached dwellings dating from the middle third of the twentieth century (St Luke's Road and Coleridge Close). To the south west, on the opposite side of St Luke's Road is the monolithic block of the telephone exchange, with the three-storey bulk of Knight's Court occupying the north-west corner of St Luke's Road and Between Towns Road.
- 2.6.** The existing buildings on the site, as the photographs indicate, are in poor condition and are neither statutorily listed nor do they appear on the City Council's list of non-designated heritage assets. The buildings are not listed as Assets of Community Value, nor has any application for such listing been sought.
- 2.7.** Between Towns Road is identified as one of the City's main thoroughfares, as it links Cowley Centre with the radial routes created by the B480 Oxford Road and the A4158 Iffley Road. At this point, it is a wide road with two carriageways and a central reservation, having the feel of an urban boulevard.
- 2.8.** The Cowley District Centre has been identified within the Council's Local Plan as an "Area of Change" where the Council will look to ensure more efficient use of land by consolidating uses and also through infill and taller development, particularly with increased heights along Between Towns Road. The City Council's Technical Advice on taller building has identified this part of Oxford as an area which has the potential to accommodate and assimilate taller development, without harming the setting of the City when it is viewed from public vantage points in the centre of the City.
- 2.9.** Between Towns Road already exhibits three, four and five storey development, some of which has been in place for 30 years or more (for example Trinity Court, the large residential building on the northern side of Between Towns Road) and some of which is either recently occupied (in the case of Between Towns Court, on the site adjacent to no. 17 Between Towns Road) or on sites which will shortly

come forward for redevelopment, in the case of the former Murco filling station site diagonally opposite the Conservative Club. Among those buildings which date from the second half of the twentieth century, most are of functional appearance (such as Knight's Court, the three-storey office building located at the junction of St Luke's Road and Between Towns Road, constructed of red engineering brick, to the rear of which sits the Telephone Exchange). The pre-existing urban context is quite ordinary and the proposal offers an opportunity for significant enhancement. It is increasingly the case that the lower two and three storey buildings fronting the main thoroughfare of Between Towns Road are at odds with the road's emerging character.

- 2.10.** Whilst the prevailing uses along the road have historically been either commercial (such as offices or car sales) or social clubs (opposite the Conservative Club is the Cowley Workers Social Club), in recent years there has been a trend towards residential use and student accommodation along this part of the road, firstly with the conversion of the four storey Trinity Court in 2014 from office to residential use (reliant upon permitted development rights), whilst outline permission was previously been granted for a 6-unit residential development to the rear of no. 17. This permission has been renewed.
- 2.11.** The completion of Between Towns Court (September 2019) has delivered 144 student study rooms and an on-site management suite. To the north-east of the site is the largely single-storey form of Our Lady's RC Primary School, which as a backland site does not interact with Between Towns Road, taking access from the B480 Oxford Road.

3.0 PLANNING HISTORY

- 3.1.** The planning history below is not comprehensive but seeks to provide Officers with an understanding of how the existing built form and mix of existing uses on the site came to exist.

17/17b Between Towns Road

64/10259/A_H Change of use from a turf accountants office to a betting shop	Approved 10/1/1964
72/26795/A_H Change of use of part of ground floor from turf accountants office to gentlemens' hair dressing salon; installation of new shop front	Approved 14/11/1972
78/00011/A_H Change of use from flat to office	Refused
84/00466/NF Change of use of first floor from flat to office	Refused
15/02245/OUT Outline application (seeking approval of access, appearance, layout and scale) for the erection of three storey building consisting of 6 x 2bed flats (Use Class C3). Provision of private amenity space, car parking, cycle and waste storage (Amended description).	Approved 13/01/2016

19 Between Towns Road (Cowley Conservative Club)

62/12937/A_H Extension to club and additional room to flat at Cowley Conservative Club	Approved 11/12/1962
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64/15541/A_H 11 Garages for private cars.	Approved 13/10/1964
66/17500/A_H Alterations and extensions.	Approved 10/05/1966
68/20703/A_H Extension to provide stage and store room.	Approved 05/11/1968
69/21388/A_H Demolition of existing billiard room and games room. Extension to form concert room, skittle alley, additional lavatory accommodation and Committee Room facilities at Cowley Conservative Club.	Approved 06/05/1969
76/00171/A_H Extension to club premises to provide new dining room area, new lounge and skittle alley and internal alterations at Cowley Conservative Club.	Approved 30/6/1976
11/01680/FUL Demolition of 19 Between Towns Road (Cowley Conservative Club). Erection of a 4 storey building to provide a new Conservative club, retail unit and 150 student bedrooms, ancillary accommodation, plant and secure and integrated cycle storage for 152 cycles. External works including associated communal spaces, 4 visitor car parking spaces and 2 disabled spaces.	Application withdrawn
14/02850/FUL Demolition of existing buildings on site. Erection for four storey building consisting of retail shop and social club on ground floor plus 20 x 1-bed, 17 x 2-bed and 8 x 3-bed flats. Provision of 26 car parking spaces accessed off St. Luke's Road and 91 cycle parking spaces within building (Amended Plans)	Application withdrawn

- 3.2.** The current submission follows the withdrawal of a similar application for student accommodation on the same site (**OCC Ref: 19/02620/FUL**). Of greatest concern to Officers was the height, massing and design of the proposed building, the landscape strategy and the impact of the building upon the character of its surroundings. Concerns were raised regarding the continuity of the frontage to Between Towns Road, which appeared “visually impenetrable”. Officers advised the withdrawal of the application to explore the setting back of the centre of the building, and to consider changes of massing along the St Luke’s Road elevation, along with a more consistent approach to fenestration.
- 3.3.** The response from Officers also invited the applicant to explore energy efficiency (at the time of the previous application, the target for energy reduction from renewable sources was 20%; this increased to 40% with the adoption of the new Oxford Local Plan 2036), and a more detailed assessment of heritage significance. This application was subsequently withdrawn, pending more detailed pre-application advice.

4.0 RELEVANT PLANNING CONSIDERATIONS

- 4.1.** Applications for planning permission fall to be determined in accordance with the policies of the local development plan for the area in which they are located, unless there are material considerations which indicate otherwise. National planning policy, as set out in the National Planning Policy Framework (“the NPPF”) is a material consideration in the determination of planning applications.

- 4.2. The local development plan for Oxford City comprises the Oxford Local Plan 2036, which was adopted in June 2020, replacing the previous Local Plan, the Oxford Core Strategy and the Oxford Sites and Housing Plan.
- 4.3. A number of the policies within the development plan are supported in their application by Supplementary Planning Documents – these will be referred to where relevant.

Oxford Local Plan 2036

- 4.4. **Policy H1** The Local Plan seeks to provide at least 10,884 new homes in Oxford over the plan period to 2036. This will be achieved by promoting the efficient use and development of land/sites, including higher densities and taller buildings.
- 4.5. **Policy H2** The policy seeks to ensure that new student accommodation (25 study bedrooms or more or 10 self-contained units) provide a financial contribution towards affordable housing delivery in the City in accordance with the appropriate formula. Such contributions will not be sought where the proposal is within an existing or proposed student campus site, or where the proposal seeks to redevelop existing purpose-built student accommodation which is owned by a University at the date of adoption of the Plan.
- 4.6. **Policy H5** Permission will not be granted for the net loss of one or more self-contained dwellings on a site unless specific circumstances are met. This could be where essential modernisation is proposed to make living accommodation acceptable and where the loss of a unit is essential for operational reasons or to secure space standards, or where the change of use of a C3 dwelling to non-self-contained C2 extra car, specialist or supported housing or sheltered accommodation or a care home is proposed. It is noted that under Part 3 of the Local Plan “Providing for specialist housing needs”, student accommodation is discussed.
- 4.7. **Policy H8** Permission will only be granted for student accommodation in a range of locations which includes within the City Centre or within a District Centre. The accommodation is to be restricted in occupation to full-time student enrolled in courses of one academic year or more. Where the development comprises twenty or more bedrooms, the design must include indoor communal amenity space for students to gather and socialise. A management regime must be agreed with the City Council, to be implemented on first occupation of the development. The development must comply with parking standards to allow only operational and disabled car parking. The developer must provide a mechanism to prevent residents parking on the site (apart from where disabled vehicles are required) and the developer shall thereafter monitor and enforce this arrangement.
- 4.8. **Policy H14** New development is required to provide reasonable privacy, daylight and sunlight for occupants of existing and new homes. Consideration should be given to overlooking to and from neighbouring properties or gardens, the privacy of existing or new homes, the orientation of windows in both existing and new development and existing and proposed walls, hedges, trees and fences in respect of protecting or creating privacy. The Council will use 25-degree and 25-degree guidelines alongside other material factors. On constrained sites with proposals for specialist accommodation, developers may use other methods to demonstrate that dwellings will enjoy adequate daylight.

- 4.9. Policy H15** New dwellings must provide good quality living accommodation for their intended use.
- 4.10. Policy RE1** Permission will only be granted where it can be demonstrated that sustainable design and construction principles have been incorporated where relevant. New-build student accommodation of 1000sqm or more must be shown to achieve at least a 40% reduction in carbon emissions from a 2013 Building Regulations compliant base case.
- 4.11. Policy RE2** Development proposals must make efficient use of land and site capacity, in a manner which is compatible with the site itself, its surroundings and broader consideration of the needs of the City. The density must be appropriate for the proposed use, the scale of development including building heights and massing should conform to other policies in the plan. It is expected that sites at transportation hubs should develop at an increased scale and density, with opportunities taken to maximise development capacity.
- 4.12. Policy RE3** Development in Flood Zone 3b will not be supported unless it is for water-compatible uses or essential infrastructure, or where on previously developed land and the proposal represents an improvement on the existing situation in terms of flood risk. Such development will not lead to an increase in the built footprint of the existing building, or a reduction in flood storage (either on the site or elsewhere). It must not put any future occupants of the development at risk.
- 4.13. Policy RE4** All development proposals will be required to manage surface water through Sustainable Drainage Systems (SuDS) or techniques to limit run-off and reduce the existing rate of run-off on previously developed sites. Surface water runoff should be managed as close to its source as possible.
- 4.14. Policy RE5** Oxford City Council will seek to promote strong, vibrant and healthy communities and reduce health inequalities. Proposals will be supported which help to deliver these aims through the development of environments which encourage healthier day-to-day behaviours and are supported by local services and community networks to sustain health, social and cultural wellbeing.
- 4.15. Policy RE6** Planning permission will only be granted where the impact of new development on air quality is mitigated and where exposure to poor air quality is minimised or reduced.
- 4.16. Policy RE7** Planning permission will only be granted for development that:
- a) ensures that the amenity of communities, occupiers and neighbours is protected; and
 - b) does not have unaddressed transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
 - c) provides mitigation measures where necessary
- 4.17. Policy RE8** Planning permission will only be granted for development proposals which manage noise to safeguard or improve amenity, health, and quality of life. Planning permission will not be granted for development that will generate unacceptable noise and vibration impacts. Planning permission will not be granted for development sensitive to noise in locations which experience high levels of noise, unless it can be demonstrated, through a noise assessment, that appropriate attenuation measures will be provided to ensure an acceptable level of amenity for end users and to prevent harm to the continued operation of

existing uses. Conditions will be used to secure such mitigation measures and operational commitments.

4.18. Policy RE9 Planning applications where proposals would be affected by contamination or where contamination may present a risk to the surrounding environment, must be accompanied by a report which:

a) details the investigations that have been carried out to assess the nature and extent of contamination and the possible impacts it may have on the development and its future users, biodiversity, the natural and built environment; and

b) sets out detailed mitigation measures to allow the development to go ahead safely and without adverse effect, including, as appropriate:

- removing the contamination;
- treating the contamination;
- protecting and/or separating the development from the effects of the contamination;

Where mitigation measures are needed, these will be required as a condition of any planning permission.

4.19. Policy DH1 Development must be of a high-quality design which creates or reinforces local distinctiveness – all development will be expected to be supported by a supporting text or visuals identifying the design rationale.

4.20. Policy DH2 The City Council will seek to retain significant views both within Oxford and from outside, in particular to and from the historic skyline. Planning permission will not be granted for any building or structure that would harm the special significance of Oxford's historic skyline. The area within a 1,200 metre radius of Carfax tower (the Historic Core Area) contains all the buildings that comprise the historic skyline, so new developments that exceed 18.2 m (60 ft) in height or ordnance datum (height above sea level) 79.3 m (260 ft) (whichever is the lower) are likely to intrude into the skyline. Development above this height should be limited in bulk and must be of the highest design quality. Applications for proposed development that exceeds that height will be required to provide extensive information so that the full impacts of any proposals can be understood and assessed. This Policy's implementation is supplemented by a Technical Advice Note on taller buildings; this Advice Note indicates clearly that Cowley Centre is a region of the City where taller development is more likely to avoid visual competition or skylining.

4.21. Policy DH3 Planning permission will be granted for development that respects and draws inspiration from Oxford's unique historic environment (above and below ground), responding positively to the significance character and distinctiveness of the heritage asset and locality. In all planning decisions affecting the significance of designated heritage assets, great weight will be given to the conservation of that asset (including its setting where it contributes to significance). A planning application for development which would or may affect the significance of any designated heritage asset (including, where appropriate, its setting) should be accompanied by a heritage assessment that includes a description of the asset and its significance and an assessment of the impact of the development proposed on the asset's significance. As part of this process full regard should be given to the detailed character assessments and other relevant information set out any relevant conservation area appraisal and management plan.

- 4.22. Policy DH4** On sites where archaeological remains are suspected to be present, applications should include sufficient information to define the character, significance and extent of such deposits so far as reasonably practical – this should include a Heritage Assessment and, if appropriate, a full archaeological desk-based assessment.
- 4.23. Policy DH5** Permission will only be granted for development affecting a local heritage asset (or its setting) if it is demonstrated that the significance of the asset, and its conservation, has informed the design of the development proposed – in determining applications which affect (directly or indirectly) a local non-designated heritage asset, consideration will be given to its significance and the extent of the impact on its significance along with the public benefits which may result.
- 4.24. Policy DH7** Bicycle and bin storage and external servicing features should be considered from the start of the design process. It should be provided in a way which does not detract from the overall design of the scheme. Materials used should be of high quality to enhance the overall design.
- 4.25. Policy M1** Development must minimise the need to travel and should be laid out and designed in such a way that it prioritise access by walking, cycling and public transport.
- 4.26. Policy M2** A Transport Assessment must be submitted for development in accordance with the requirements as defined in Appendix 7.1. Transport Assessments must assess the multi-modal impacts of development proposals and demonstrate the transport measures which would be used to mitigate the development impact. A Travel Plan, which has clear objectives, targets and a monitoring and review procedure, must be submitted for development that is likely to have significant transport implications in accordance with the requirements in Appendix 7.2. Construction Management Plans will be anticipated for 20 dwellings or more or 500sqm of non-residential floorspace.
- 4.27. Policy M3** In Controlled Parking Zones (CPZs) or employer-linked housing areas (where occupants do not have an operational need for a car) where development is located within a 400m walk to frequent (15minute) public transport services and within 800m walk to a local supermarket or equivalent facilities (measured from the mid-point of the proposed development) planning permission will only be granted for residential development that is car-free.
- 4.28. Policy M5** Development must comply with or exceed the relevant minimum cycle parking standard.
- 4.29. Policy V1** Permission will be granted for the development of town centre uses provided the use is appropriate to the scale and function of each centre and reflects its distinctive character.
- 4.30. Policy V7** The City Council will work to improve access to social and community infrastructure and to protect and retain existing cultural and community facilities. The loss of such facilities will be resisted unless new or improved facilities can be provided at a location that is equally or more accessible by walking, cycling and public transport.
- 4.31. Policy AOC2** The Local Plan identifies Cowley Centre as an area of change where opportunities ought to be taken to deliver a range of enhancements where relevant; these include improvements to the public realm, making more efficient

use by consolidating uses and through infill and taller developments, the introduction of residential uses and increased building heights along Between Towns Road.

National Planning Policy Framework (“the NPPF”) (February 2019)

- 4.32.** Planning law requires applications for planning permission to be determined in accordance with the development plan unless there are material considerations which indicate otherwise – the NPPF is a material consideration in planning decisions (Paragraph 2). The NPPF presents a presumption in favour of sustainable development – development which accords with an up-to-date development plan should be approved without delay. Where there are no relevant development plan policies, or where the policies which are of most relevance are out of date, permission should be granted unless the application of the policies in the Framework provide a clear reason why the development should not be approved or any adverse impacts of granting permission demonstrably outweigh the benefits, when assessed against the NPPF as a whole (Paragraph 11).
- 4.33.** Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system and good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community (Paragraph 39). Local planning authorities should encourage take-up of any pre-application services they offer, encouraging applicants to engage with the local community as well as with statutory and non-statutory consultees (Paragraph 40).
- 4.34.** It is the Government’s objective to significantly boost the supply of homes – to achieve this, it is important that a sufficient amount and variety of land can come forward here needed which can meet the needs of groups with specific housing requirements. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including the needs of students (Paragraphs 59-61).
- 4.35.** Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to growth, management and adaptation – policies should define the extent of town centre and make clear the range of uses permitted in such locations, recognising that residential development often plays an important role in ensuring their vitality (Paragraph 85).
- 4.36.** The planning system should actively manage patterns of growth to pursue opportunities to promote walking, cycling and public transport use. Patterns of movement, streets, parking and other transport considerations are integral to the design of scheme and contribute to making high quality places (Paragraphs 102-103).
- 4.37.** Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. They should, among other things, promote and support the development of under-utilised land and buildings, particularly if this can meet identified needs for housing where land supply is constrained and available land can be used more effectively. Opportunities to support the use of airspace above existing buildings should also be supported where the development would be consistent with the prevailing height and form of neighbouring properties and with the overall street scene,

where development is well designed and maintains safe access and egress (Paragraphs 117-118).

- 4.38.** Local planning authorities should take a proactive role in identifying and helping to bring forward land which may be suitable for meeting development needs, including suitable sites on brownfield registers (Paragraph 119).
- 4.39.** Planning policies and decisions should ensure that developments function well, adding to the overall quality of an area over the lifetime of the development, are visually attractive as a result of good architecture, layout and landscaping, are sympathetic to local character and history without discouraging appropriate innovation or change, establishing or maintaining a strong sense of place and optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (Paragraph 127).
- 4.40.** Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community (Paragraph 128).
- 4.41.** In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standards of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings (Paragraph 131).
- 4.42.** Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes and the risk of overheating from rising temperatures (Paragraph 149). To help increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy from these sources and identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. In determining planning applications, new development will be expected to comply with any development plan policies on local requirements for decentralised energy supply unless this can be demonstrated not to be feasible or viable and to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption (Paragraph 153).
- 4.43.** Inappropriate development in areas at risk of flooding should be avoided, however where development is necessary in such areas, the development should be made safe for its lifetime without increasing risk elsewhere (Paragraph 153). Development should only be allowed in areas at risk of flooding where it can be demonstrated that:
- Within the site, the most vulnerable development is located in areas where the risk is the lowest;
 - The development is appropriately flood resistant and resilient;
 - The development incorporates sustainable drainage systems, unless the evidence is clear that this would not be appropriate;
 - Any residual risk can be safely managed; and
 - Safe access and egress routes are included (Paragraph 163).
- 4.44.** Policies and decisions should contribute to and enhance the natural local environment, preventing new and existing development from contributing to, being put at risk from or affected by unacceptable levels of pollution. Development

should seek to improve local environmental conditions wherever possible (Paragraph 172).

- 4.45.** In determining applications, local planning authorities should require applicants to describe the significance of any heritage asset affected by the development, including any contribution their setting makes. The level of detail provided should be proportionate to the significance of the asset and no more than is sufficient to understand the potential impact upon this significance. As a minimum the relevant historic environment record should have been consulted and heritage assets assessed using appropriate expertise where necessary (Paragraph 189).
- 4.46.** The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application (Paragraph 197).

National Design Guide (October 2019, MHCLG)

- 4.47.** Well-designed new development is influenced by an appreciation of local character, the characteristics of the existing built form and the elements of a place which make it distinctive. This would include considering the composition of the streetscene and individual buildings, height, scale and massing as well as views and vistas, along with façade design (Paragraph 52).
- 4.48.** Character starts to be determined by the siting of development in the wider landscape, then by the layout – the pattern of streets, landscape and spaces, the movement network and the arrangement of development blocks. It continues to be created by the form, scale, design, materials and details of buildings and landscape. In this way, it creates a coherent identity that everyone can identify with, including all residents and local communities. New character may also arise from a response to how today’s lifestyles could evolve in the future, or to the proposed method of development and construction. Where the character of an existing place has limited or few positive qualities, then a new and positive character will enhance its identity (Paragraphs 57-59).

5.0 CURRENT PROPOSAL

- 5.1.** Permission is sought for the demolition of the existing buildings (no’s 17 and 17b Between Towns Road and no. 19) and their replacement with a building of between three and five storeys in height, intended to provide 206 student study rooms, communal indoor and outdoor space, replacement commercial floorspace and bin and bicycle storage together with parking for 4 vehicles (intended for use only by disabled students).
- 5.2.** The building takes a five-storey form adjacent to Between Towns Road (the adjacent development, Between Towns Court, is also five storeys in height), whilst stepping down to four and three storeys at the rear of the site to achieve a more appropriate transition in scale to the two-storey residential development to the south of the site. The internal layout includes “clusters” of study rooms, served by a communal lounge / kitchen area – each cluster typically has 6 or 8 bedrooms, although in some cases there are more or fewer bedrooms. Some of the units provided are self-contained studios.
- 5.3.** An appropriate quantum of outdoor open space is proposed, with the south-facing rear “courtyard” area located between the flanks of the building proposed to be landscaped together with a large open-air terrace at fourth floor level.

- 5.4. 208 cycle spaces are proposed adjacent to the site’s southern boundary. The proposal also makes allowance for the storage and collection of landfill waste and recycling from St Luke’s Road.
- 5.5. The proposal has been the subject of pre-application dialogue with the City Council’s Officers following the withdrawal of an earlier planning application – the Design and Access Statement sets out clearly how Officers’ advice has been responded to and what design changes have been incorporated as a result.

6.0 PLANNING ISSUES

Principle of student accommodation

- 6.1. For the continued growth of academic floorspace at both Universities, it is essential for student accommodation to come forward. Policy H9 of the new Local Plan identifies that permission for new or redeveloped or refurbished academic floorspace will only be granted where it is demonstrated that the new accommodation would not generate or facilitate any increase in student numbers or that the number of full-time taught course students living in non-university provided accommodation does not exceed the given thresholds. Keeping students out of market accommodation as far as possible therefore helps to deliver the growth of new academic space, helping the Universities to maintain their positions whilst also supporting the housing market in the City.
- 6.2. Policy H8 of the City Council’s Sites and Housing Plan identifies a range of locations in which student accommodation will be accepted. Such locations include sites within City or District Centres – consequently there can be no question that within the terms of the Local Plan, this is a suitable and appropriate location for student accommodation, which Officers’ advice already confirms. This particular site is well suited to such accommodation, given its proximity to local facilities and services as well as public transport, pedestrian and cycle links to the rest of the City.
- 6.3. The Policy also provides that for development of 20 or more bedrooms, the design must include indoor communal space. A management regime should be agreed with Oxford City Council to be implemented on first occupation (to be secured by a planning condition) and the developer must undertake to prevent residents from parking their cars on the site, or anywhere in the City. A draft of how such a management regime is intended to operate accompanies the submission and it is anticipated that the finalised wording of this document would be the subject of a planning condition, to be satisfied before the development could be occupied.
- 6.4. The proposal demonstrates areas of internal communal space – these take the form of kitchen and lounge areas for each of the clusters. There is also break-out space at ground floor level – this takes the form of a central hub, which is envisaged to be used for recreation or for informal study. There is also an exhibition / function space which is intended to be for use by the student accommodation but is also to be available for public hire. It is notable that the Council’s recently adopted policy does not appear to require student accommodation to provide usable outdoor amenity space, however this proposal seeks to do so in the spaces around the building, alongside appropriate landscaping.
- 6.5. Overall, the proposal represents an opportunity to make an efficient use of this site. Using the Guidance to the MHCLG’s Housing Delivery Test, which estimates that every 2.5 student rooms provided equates to the provision of a dwelling, a

development of 206 student study rooms provides around 82 dwellings. In terms of the number of bedspaces, this equates to an occupancy density of around 687 bedspaces per hectare (the site is around 0.3 hectare in size), which is undoubtedly high (the Local Plan defines high density development as development of more than 100 dwellings per hectare) and accords precisely with the Council's objective of locating high density development at transport hubs, whilst still having due consideration for the areas surrounding the site and the scale of nearby development. The chosen approach is clearly and demonstrably in accordance with Policy RE2 of the Local Plan, which seeks efficient use of sites.

Loss of existing residential units

- 6.6.** At first floor level, there is a two-bed flat which is located above the betting shop (17a) – this was granted planning permission in 1964 (64/14482/H). From the plans submitted, it appears that the use of the neighbouring one-bed first floor unit (17c) at that time was as offices. It is unclear precisely when these offices were converted into residential use, but it appears that this change of use did not benefit from planning permission (applications seeking permission for the change of the floorspace above the barber's shop from residential to office use were refused in 1978 and 1984).
- 6.7.** The relevant Local Plan Policy (H5) accepts the loss of self-contained dwellings in a number of circumstances – these include where essential modernisation is proposed to make living accommodation acceptable and where it is shown that the loss of a unit is essential for operational reasons, or circumstances where specialist housing is proposed – the Local Plan appears to accept that student accommodation is a specialist housing need (student accommodation is the first form of accommodation which appears for consideration as a specialist housing need at Part 3 of the Local Plan).
- 6.8.** Attached as **Appendix 1** are a series of photographs of 17a which shows its existing condition – 17c is currently occupied so access is unavailable. 17a is currently vacant and is understood to have been so for quite some time. The building is in poor repair and is fairly uninviting. Access to 17a above the betting shop is taken from the rear of the building within an environment where surveillance is rather poor, is overgrown and in a poor state of repair. Access to the 17c emerges directly onto the vehicular access which serves the parking area attached to the commercial use on the ground floor. Both units are at first floor level and neither would comply with modern letting standards, nor are they suitable to provide family accommodation.
- 6.9.** The loss of the units is required to facilitate a wholesale development of the site covered by the existing buildings along with the Conservative Club, the end result of which will be a higher number of student rooms and a significant increase in the extent of financial contribution for affordable housing from the site.
- 6.10.** Neither of these existing units enjoys any private outdoor space. The photographs illustrate the paucity of outlook from bedroom windows – some of the bedrooms enjoy very restricted outlooks, which potentially may diminish further in the future¹ and is already dominated by the presence of Between Towns Court as this development nears completion. In any event, the internal and external

¹ Oxford City Council granted outline permission for a three storey to the rear of no. 17 Between Towns Road comprising 6no. 2-bed flats (**OCC Ref: 18/02918/OUT**) - this outline permission renewed an earlier outline permission and remains extant.

environment of the existing flats is poor and would be unlikely to meet the standards posed in the Local Plan. The reality is that the location of the units and the quality of accommodation available would most likely appeal to potential occupants looking for rental properties with low rental outgoings, including students with high concentrations of occupancy being of greater importance than accommodation standards.

- 6.11.** Notwithstanding the above, as part of the original iteration of the scheme, the design team considered incorporating self-contained residential unit into the mix of uses proposed on the site as a notional “replacement” for what is proposed to be lost. However, the exercise resulted in a fairly unsatisfactory layout on the site, particularly in the interaction between student accommodation and self-contained residential units, given the need to provide appropriate internal and external standards for these units. The re-provision of market housing on the site would dilute the ability to provide student study rooms, and by extension would diminish the extent to which the scheme could take existing students in the City out of market housing.
- 6.12.** The loss of the residential units needs to be considered within the context of the current application, under which a significant contribution towards the provision of affordable housing will come forward based upon the gross internal area of the proposed development. Furthermore, the proposal also needs to be viewed through the prism of increasing the available stock of housing in Oxford City. Paragraph 61 of the NPPF provides that local planning authorities should plan for the housing needs of different groups, including students.
- 6.13.** Planning Practice Guidance is clear that all student accommodation can count towards an authority’s housing land supply based upon the amount of accommodation that new student housing releases into the wider housing market (by allowing existing properties to return to general residential use). Authorities need to base their calculations on the average number of students living in student only accommodation, based upon census data (PPG, Paragraph 68-034-20190722). In this case, the loss of 2 sub-standard residential units is far outweighed by the levels of market housing that could be released as a result of the redeveloped capacity of this element of the proposed site.
- 6.14.** The City Council’s most up-to-date assessment of Housing and Economic Land Availability (March 2019) has been updated in the light of the Government’s introduction of the Housing Delivery Test. The Guidance to this Test states that the Government applies the national ratio of 2.5 bed spaces – i.e. for every 2.5 student bedspaces provided, this frees up one additional dwellinghouse. Based upon such an assessment, the delivery of 206 student study rooms has the potential to free up 82 dwellings in the private market. This is viewed as a substantial planning benefit. This is an argument that the City Council has accepted elsewhere, notably the Dorset House redevelopment on London Road² in Headington.

Loss of a community facility and commercial use

- 6.15.** Policy V7 provides that planning permission will not be granted for development resulting in the loss of community facilities unless equivalent new or improved facilities can be provided at a location equally or more accessible by walking, cycling and public transport.

² OCC Ref: 10/03136/FUL.

- 6.16.** The existing building has become degraded both internally and externally, and it would require substantial investment to meet the modern requirements of a private members club.
- 6.17.** When the building was in use, it was in use strictly as a private members' club. Access and use were controlled by membership and there was no obligation on the part of the owners to facilitate public access to the building. Any such access was by either by member introduction or appointment such as pre-arranged functions. This was a strictly private club and operated as such it is difficult to envisage that there is a foreseeable need for a replacement private members club with no public access other than that permitted by club rules as such would represent the status quo. It is therefore doubtful that in these circumstances the current facility could be viewed as a community facility as no particular facilities are open to the community. For the purposes of interpreting policy this building should be seen more in the context of a private members club rather than a community facility.
- 6.18.** The conceivable functions that the Conservative Club could host if in operation (and assuming no entry restrictions were to apply to non-paying association members) are already being met locally, as the table below sets out:

Schedule of Community Facilities in and around Cowley

Venue	Distance from Application Site (metres)	Available facilities
TJ's Snooker Club	42	Private functions, English and American pool, snooker, billiards, televised sporting events, darts.
Cowley Workers Social Club	42	Private functions, bingo, club nights.
Original Swan PH	125	Pool or snooker, televised sporting events, function room available.
The Venue @ Cowley	200	Community centre with rooms for hire. Cookery classes, functions or conferences Coffee mornings Ethnicity events.
Ark-T Centre, Crowell Road	800	Dance and yoga classes, rehearsal space, creativity camps, drama classes.
Don Bosco Centre, attached to Our Lady Help of Christians RC Church	500	Social, meeting and educational activities – hire available for local organisations for meeting and training purposes (caters for groups of up to 100).
Silver Band Hall The Band Hall Sher Afzal Close, Temple Road Oxford OX4 2FA	330	Venue for meetings, rehearsals, societies and clubs.

- 6.19.** As part of the evidence base for its Emerging Local Plan, the City Council has put together a Background Paper "*Quality of Essential Services and Facilities*" which seeks to consider the availability and accessibility of essential services and facilities. It seeks to consider a range of available facilities in terms of their overall geographical coverage, which it looks to do on the basis of postcodes. South East

Oxford (postcode OX4). With regard to community centres, South East Oxford is the area of the city that is best served – within the postcode sector there are 13 community centres and the availability of facilities per capita is among the best in the City:

Figure 6.5.1. Numbers of facilities per area and per head of population

Facility/service	OX1		OX2		OX3		OX4	
	Total	People per facility	Total	People per facility	Total	People per facility	Total	People per facility
GP Practice	6	2,855	5	6,741	7	3,381	8	7,589
Dental Practice	5	3,546	3	15,601	10	3,006	9	7,102
Pharmacy	3	5,910	7	4,457	8	4,383	10	3,995
Primary School	2	8,365	7	4,457	9	3,340	14	4,565
Secondary School	0		0		1		1	
Community Centre	1	2,112	5	6,340	8	4,853	13	4,917
Leisure Centre	0		1		1		1	
Children's Centre	1	77,931	2	13,051	1	13,020	1	15,879
Hub	48	1,064	37	1,156	52	1,175	46	1,366
Post Office	2	3,012	3	3,344	3	7,314	4	10,024

6.20. Officers are also invited to consider the recent approval for the redevelopment of the Central Oxford Conservative Club (19/02306/FUL) – as in the current instance, that building had been vacant for some years as declining membership meant that continued operation was no longer viable. Although the proposals did not include any element of re-provision, Officers were of the view that the local community would not be disadvantaged by its loss, given the wide range of alternative facilities available (which is as true in Central Cowley as it is in the middle of Oxford). Officers also noted that the fact that the building was a private members club, where access was dependent upon paid membership, limited access in comparison with other local facilities where no such restrictions existed.

6.21. That notwithstanding, this proposal does include a ground floor space which is intended for exhibition use – control is intended to be delegated to the management operator of the new student accommodation, however it is to be made available for use by community groups upon request. The availability of the facility is likely to be to a wider range of users (and at a more flexible range of times) than the Conservative Club when it was in use.

6.22. The existing commercial units (17 and 17b, currently being used as a bookmaker and a barber-shop respectively) are within the Cowley District Centre, but do not form part of the District Shopping Frontage. As such there is no specific policy that would seek to ensure their re-provision within the redevelopment of the site. However, the pre-application dialogue which we have had with Officers strongly indicates a desire to maintain an active frontage to Between Towns Road. The location of the proposed community and exhibition space within the building, facing onto Between Towns Road, seeks to ensure that this delivers an active frontage to the road, as the Planning and Urban Design Officers have advised during pre-application dialogue.

Affordable Housing and CIL

6.23. In accordance with Policy H2 of the Local Plan (and the formula set out at Appendix 3.2 of the Plan), a contribution would be secured towards the delivery of affordable housing in the City based net increase in residential floorspace.

- 6.24.** Such a contribution would be secured via a planning agreement under s.106 of the Town and Country Planning Act 1990.
- 6.25.** CIL would be chargeable in respect of the net uplift in usable floorspace.

Design and Visual Impact

- 6.26.** The existing buildings on the application site are of no great architectural value and do not contribute positively to the public realm. The proposal represents an opportunity for a comprehensive redevelopment of a prominent plot, developing the site at a scale that would be compatible with existing (and consented) development in the locality, offering opportunities for enhancement both in terms of the built form and the accompanying landscaping.
- 6.27.** The design of the building has been the principal issue upon which the recent pre-application dialogue with Oxford City Council has focused and the Design and Access Statement seeks to outline clearly what advice has been given by Officers and how the designers have acted upon it – this is clearly set out at Section 1.9 of the Design and Access Statement. Clear and detailed consideration has been given to the site and its constraints and how the proposal responds to its surroundings and the approach that was taken has been set out in the Design and Access Statement.
- 6.28.** The principal changes to the design of the building with regard to the withdrawn scheme include the recession of the central core, the development of a more coherent approach to fenestration and the use of different materials to reduce the perceived massing of the building and to achieve a more successful transition, particularly along St Luke’s Road where the scale of development tends more towards a two-storey, suburban form. Changes in materiality also enable more to be made of the junction between St Luke’s Road and Between Towns Road. The choice of materials is influenced strongly by other buildings locally, where buff-coloured brickwork and standing-seam roofing and cladding are commonly seen. The visualisations provided within the Design and Access Statement illustrate the scale of the proposed building in views along Between Towns Road.
- 6.29.** Following the development at Between Towns Court and the emerging redevelopment of the former Murco filling station, the scale of buildings along the frontage has changed – the Council’s Local Plan encourages taller buildings within Cowley Centre to ensure that the most efficient use of land is made. Despite being a maximum of five storeys in height, this proposed building would not exceed 21 metres in height. The Council’s Technical Advice Note suggests that from most areas in and around the City of Oxford, development at such a height is unlikely to be visible or to compete with other buildings in these views. As part of the previous application, the applicants included an LVIA which tested the long-range and shorter-range visual impact of a building of between three and five storeys in height.
- 6.30.** The proposal would be visible at a distance from viewpoints within the City Centre, however the visual impact would be small and neutral. The overall height of the building proposed as part of this submission in views from the City Centre is similar to that of the withdrawn scheme. Hence, most of the conclusions in the 2019 LVIA remain valid in its assessment of landscape impact and the impact of intervening vegetation.

Relationship with neighbouring buildings

- 6.31.** This part of the Statement considers the relationship between the proposed development and the adjacent Between Towns Court (a five storey development providing 144 student study rooms) and also the two-storey residential development to the south (St Luke’s Road and Coleridge Close).
- 6.32.** The accompanying Sunlight and Daylight analysis uses the BRE document “Site Layout Planning for Daylight and Sunlight” as its assessment base and the proposed building and neighbours have been modelled and assessed with regard to the vertical skyline component (VSC), the no sky-line, average daylight factor and annual probable sunlight hours. However, it should be noted that the BRE standards is only intended as guidance – Paragraph 123(c) of the NPPF is clear that local authorities should take a flexible approach towards applying policies or guidance relating to daylight and sunlight where this would otherwise inhibit making efficient use of a site, provided that the resulting scheme still provides acceptable living standards. This is the case for housing and must be even more relevant in the case of student accommodation where tenancies typically only last for eight or nine months of the year.
- 6.33.** Based upon the proposed site layout and the proposed drawings, it is shown that the examined buildings surrounding the site maintain acceptable levels of daylight and sunlight.
- 6.34.** Changes to the vertical skyline component would be considered negligible in all tested rooms and all rooms within Between Towns Court maintain acceptable daylight factors.
- 6.35.** The finalised design seeks to simplify the elevational treatment on the north-eastern elevation of the building (facing towards Between Towns Court) whilst increasing the number of recessed elements (which also offers the potential incorporate landscaping along the boundary). The incorporation of louvres on windows serving bedrooms which are nearest to the boundary intends to ensure that no unacceptable impact upon the amenities of the neighbouring building would result. Such relationships are not unusual in a dense urban area where maximising the use of land is seen as a priority and an objective of national planning policy.
- 6.36.** Analysis undertaken in respect of this development shows that, on the whole, habitable rooms (i.e. the study rooms themselves, rather than the ground floor function space or the kitchen spaces, which are unlikely to be used for more than 30 minutes at a time) enjoy acceptable standards of internal amenity when assessed against the BRE standards for daylight and sunlight.

Energy and Sustainability

- 6.37.** The Council’s adopted Policy (RE1 of the Local Plan) requires that new development should achieve a 40% reduction in carbon emissions from a 2013 Building Regulations compliant base case, to be secured via on-site renewable energy or low carbon technology / energy efficiency measures.
- 6.38.** The accompanying Energy and Sustainability Statement notes the incorporation of energy saving technologies comprising:
- Low air permeability of the building façade;
 - Improved u-value

- High performance low energy glazing;
- A highly efficient heating system; and
- Energy efficient LED lighting.

6.39. The Statement identifies that a range of renewable energy sources have been considered for use, however only photovoltaic technology has been considered to be appropriate and viable.

Transport

6.40. The accompanying Transport Statement identifies that the proposal will not result in a detrimental impact upon highway safety or the flow of traffic. The access arrangements are compatible with local requirements. The proposed development is intended to be car free, save for the provision of servicing access and disabled parking spaces

6.41. A tenancy agreement will include a clause stipulating that students are not to bring cars into Oxford, or to keep them there. The accompanying management regime identifies how this is to be achieved.

6.42. The site is located in part of the City which is highly sustainable and whose location offers considerable alternatives to journeys by private car.

Landscaping

6.43. Improvements in landscaping and enhancements to the public realm are a critical part of the Council's Strategy for the District Centre.

6.44. The site layout seeks to show an indicative landscaping treatment – it is anticipated that the finalised version of this will form the subject of an appropriately worded planning condition, however Section 3.9 of the Design and Access Statement identifies that hedge planting, outdoor seating and planted/grassed areas along with SUDs swales are intended to considerably reduce the amount of hard surfacing on the site. The landscaping also seeks to achieve a successful cohesion between the proposed development and the recently completed Between Towns Court.

Ecology

6.45. A preliminary ecological appraisal and bat survey has been commissioned. A Phase 1 habitat survey was carried out during August 2019. Limited bat roosting potential was identified within the building. The site's suburban location means low to very low levels of bat activity locally. No significant ecological interest has been identified.

6.46. The identified enhancements to landscaping offer potential for a net improvement in the biodiversity potential of the site; features such as swift boxes are not shown on the proposed elevations but could easily be incorporated and could form the subject of an appropriately worded condition is considered necessary by Officers.

Flooding and Drainage

6.47. As identified at Section 2 of this Statement, the site is located within Flood Zone 1 and measures only around 0.3ha in size.

- 6.48.** The accompanying Surface and Foul Water Management Strategy (Stantec) identifies that the site is covered entirely, either by buildings or by hard-surfacing. It is entirely impermeable and is understood to drain directly to Thames Water sewers located in Between Towns Road and St Luke's Road.
- 6.49.** The proposed site usage will reduce the impermeable area of the site to around 2,080sqm, a reduction of around a third. Surface water run-off will be collected via rainwater pipes and discharged to a geocellular crate system beneath the car park. The surface water system proposes to attenuate surface water run-off and discharge into Thames Water sewers to achieve a 40% betterment over existing brownfield run off rates. Foul water produced by the development will be discharged to the Thames Water sewer in St Luke's Road.

Archaeology

- 6.50.** Historic maps show the site as lying on farmland between the settlements of Church Cowley and Temple Cowley. The site was first developed in the 20th century for domestic housing on the northeast side of the site, then by construction of a Conservative Club on the southwest. The site lies on ridge of limestone and clay to the southwest of Oxford. The area has been utilised for stone, sand and clay extraction for some two thousand years and a number of archaeological sites lie to the northeast and southwest together with listed buildings relating to the villages of Church Cowley and Temple Cowley.
- 6.51.** To the north of the site lies Temple Cowley, which formed around a preceptory of the Knights Templars in the medieval period. The exact location of the preceptory is not known, but it is unlikely to lie within the present site, which was probably fields in the medieval period. Casual observations on the south part of the site in the 20th century found Oxford ware pottery. More specific archaeological work on the adjacent plot to the southwest of the site found evidence of Roman pottery production, including kilns, clay preparation areas, workshops and waste dumps. Archaeological work on the adjacent plot to the northeast in 2018 found part of a Roman field system, the ditches of which included much late Roman Oxford pottery, including wasters. These sites form part of the internationally important Oxford Roman Pottery Industry.
- 6.52.** Additional geophysical survey work (November 2019) suggests a number of anomalies that are likely to be more recent disturbances (not Roman). The data suggests there are no kilns on the site, as the strongest magnetic signal comes from a pit containing pottery.

Heritage Impact

- 6.53.** The accompanying Heritage Assessment, undertaken by JP Heritage, identifies a construction date for the Conservative Club of 1924, albeit with substantial changes to the property during the 1960s and 1970s which have impacted upon the age and integrity of the original building – the Conservative Club would not meet the criteria for listing. Any aesthetic interest arising from the original external element fronting Between Towns Road has been largely diminished by later alterations.
- 6.54.** The building would be visible from within the Temple Cowley Conservation Area, but not prominent and there are existing four and five storey buildings within the context of the site (Broadfield House and Between Towns Court respectively). The proposal would not have a harmful impact upon the Conservation Area's setting, not upon the setting or fabric of any other designated heritage asset.

- 6.55.** The pre-application advice received identified that further, more detailed assessment should be undertaken in respect of the social heritage value associated with the current building. The proposal does not meet the criteria for listing – the Conservative Club building was substantially altered in the 1960s and 1970s. The building itself is of low aesthetic value and its setting has considerably changed since it was originally built.
- 6.56.** Whilst its origins appear contemporaneous with the origins of Cowley as a residential suburb to meet the needs of the nearby motor works in the 1930s and there is some modest social and communal value which can be attributed to this association.
- 6.57.** The building is in a deleterious condition and the viability of the building as a community venue going forward is extremely limited – the building does not contribute positively to local character or distinctiveness and its loss represents an opportunity to redevelop the site in a way that enhances the site and its setting. The accompanying Heritage Assessment identifies that the benefits associated with redevelopment ought to be attributed greater weight than the limited level of harm arising from the permanent loss of social value, when the proposal and its impacts are weighed in the balance, as required by Paragraph 197 of the NPPF.
- 6.58.** The overall impact upon the historic environment would be low and needs to be viewed against the benefits associated with improving the availability of market housing and delivering a more coherent street scene along Between Towns Road, which at present appears fragmented with no overarching theme as the components of which it comprises are quite different elements.

Air Quality

- 6.59.** The accompanying Air Quality Assessment takes a conservative approach and assumes that no improvement in the pollutant background concentrations or road transport emission factors between the base point (2017) and the likely first year of occupation (2022). No particular mitigation measures are identified as being required as the air quality objectives are anticipated to be met, although measures can be taken to reduce emissions arising from the development – in this regard the provision of secure and covered cycle storage will be effective, together with the requirement (secured by planning condition and ultimately by individual tenancy agreements) that occupants are not to bring cars into the City.
- 6.60.** The renewables strategy which the previous AQA referred to (as submitted) has been supplemented by Air Source Heat Pumps. It is not envisaged that the proposal's current form would have an impact which would be any more detrimental to local air quality than the previous submission.
- 6.61.** Potential dust risk impacts for development are classified as 'low risk', however a Dust Management Plan can be secured to mitigate any potential impacts of construction dust upon local air quality.

Noise Impact

- 6.62.** The accompanying acoustic report identifies that an environmental noise survey has been undertaken to measure ambient noise levels in the area – outline noise levels have allowed an assessment of the level of exposure to noise of the proposed development site to be made. Outline mitigation measures, including a glazing specification and the use of appropriate ventilation are recommended and

should achieve recommended internal noise levels for the proposed development.

Trees

- 6.63.** The accompanying arboricultural assessment records three individual trees and one group of trees (all category C trees). All of those trees recorded are on third party land, with the canopy of G1 overhanging the garages. No trees are to be removed to enable the scheme to be implemented. Careful design seeks to ensure the continued contribution to the greening of the surroundings of the site.
- 6.64.** No future felling or pruning pressures are anticipated. In order to safeguard these trees through the site's redevelopment, a site specific Arboricultural Method Statement will be drawn up and implemented and may form the wording of an appropriately worded planning condition.

7.0 CONCLUSIONS

- 7.1.** This Statement has considered all of the relevant planning issues in respect of the proposed redevelopment of no's 17/17b Between Towns and Cowley Conservative Club to provide a development of 206 student study rooms with ancillary facilities and indoor and outdoor amenity space.
- 7.2.** The proposed use is one which is highly appropriate for its location (Cowley is the Primary District Centre in Oxford) – the location is highly sustainable and offers considerable opportunities for journeys other than by private car. Management controls can be imposed which prevent harmful impacts upon the locality, including from students bringing cars into the City. An appropriate clause in each tenancy agreement would seek to prevent this.
- 7.3.** The proposal seeks to make the most effective and appropriate use of the application site, replacing degraded existing buildings with a new building which would meet the Council's imposed energy and sustainability standards and seeks to respond positively to its urban context. The proposal has been the subject of pre-application advice from Officers of Oxford City Council and the submission seeks to make clear how Officers' advice has been implemented – in some instances there was considered to be justification for a departure from the suggested approach and these instances are outlined in the Design and Access Statement. The changes in materiality and differing degrees of set-back have achieved the breaking up of massing which Officers encouraged. Changes to fenestration rhythms offer the development a vertical, rather than horizontal emphasis, making the building appear less long.
- 7.4.** The visual impact of this development in longer distance views is not dissimilar to that of the withdrawn application, being of a similar height and scale of building – the LVIA which accompanied the withdrawn application concluded that although visible in views from the City Centre and in and around Cowley, there would not be a harmful visual impact, with the building being of a similar height to surrounding development. Taller development is encouraged along Between Towns Road in the new Local Plan – the visualisations included in the Design and Access Statement tend to demonstrate that it is increasingly the case here that lower buildings appear out of place, rather than taller ones.
- 7.5.** It is not considered that the existing Conservative Club can truly be considered as a "community facility" – even if the Council takes the counterview, there are cogent reasons for not "reproviding" a community use as part of the

redevelopment, including the wide availability of alternative facilities in the local area. That said, the applicants' intention is to provide an exhibition space that is available for use by local charities upon application to the management company responsible for the site. It is envisaged that the terms upon which this space would be available and by whom would be more expansive than was the case for the former Conservative Club.

- 7.6.** The proposal can secure other planning benefits in terms of offering an opportunity for enhancement of the public realm, the inclusion of soft landscaping (which can in the fullness of time enhance biodiversity on the site) as well as reducing considerably the footprint of development and hard standing on the site which offers the potential to significantly increase surface water run-off.
- 7.7.** The submission also identifies why in this instance it is considered that the loss of residential accommodation, albeit in conflict with Policy H5 of the Local Plan, can be justified. There is a demonstrable need for student housing in Oxford – student accommodation is prefigured by the NPPF as contributing towards housing delivery in an area - and the proposal will generate a significant financial contribution towards the delivery of affordable housing in Oxford, alongside CIL contributions. The Local Plan also outlines student housing as specialist accommodation – the redevelopment is considered to meet the exceptions to the normal restrictive approach taken by the Council that the Policy poses.
- 7.8.** The proposal accords with the strategic objectives of both local and national planning policies; it makes an efficient and effective use of land and accords with all of the relevant technical standards. It has been the subject of appropriate consultation with local residents and representatives. We hope therefore that it will meet with the support of Officers.

Appendices

APPENDIX 1 Photographs demonstrating existing condition of no's 17/17B Between Towns Road

Appendix 1



External photographs from Between Towns Road and from vehicular access to the side showing entrance to Flat 17c (on first floor).



Photographs showing rear of no's 17/17b. The newly constructed Between Towns Court can be seen in the upper photograph.



Photographs taken from habitable room windows within first floor accommodation showing poor quality of outlook from these spaces.