

PLANNING, DESIGN AND ACCESS STATEMENT

**TRAUMA BUILDING
AT
JOHN RADCLIFFE HOSPITAL,
HEADLEY WAY,
OXFORD**

**ON BEHALF OF
OXFORD UNIVERSITY HOSPITALS NHS FOUNDATION TRUST**

PREPARED BY

Carter Jonas

APRIL 2021

CONTENTS	Page No.
1.0 INTRODUCTION	2
2.0 THE APPLICATION SITE AND SURROUNDINGS	3
3.0 RELEVANT SITE PLANNING HISTORY	5
4.0 THE PROPOSED DEVELOPMENT	5
5.0 NATIONAL PLANNING POLICY CONTEXT	8
6.0 LOCAL PLANNING POLICY CONTEXT	11
7.0 ASSESSMENT OF THE PROPOSED DEVELOPMENT	15
8.0 SUMMARY & CONCLUSIONS	22

1.0 INTRODUCTION

1.1 Carter Jonas is instructed by the Oxford University Hospitals NHS Foundation Trust (hereafter referred to as 'the Trust' or 'the Applicant') to prepare and submit a Full planning application to Oxford City Council ('OCC') for the removal of the existing external cladding on the Trauma Building at the John Radcliffe Hospital, Headley Way, Oxford ('the site'), and the erection of new, replacement external cladding. The application is made in full; the description of development ('the proposed development') is as follows:

“Removal of existing external cladding; erection of new external cladding to the Trauma Building at the John Radcliffe Hospital, Oxford.”

1.2 The Applicant is required to undertake the proposed development as the existing external cladding on the Trauma Building has been identified as being a flammable and dangerous material.

1.3 The Trust undertook a site wide investigation of its properties following the Grenfell Tower incident of 2017, specifically in relation to the fire risks identified from Aluminium Composite Materials. This investigation confirmed that the Trauma building presented a fire risk and as such, the operation of the building has largely since ceased, with only the ground floor of the building continuing for use for in-patient services only.

1.4 Having reviewed various options to address the fire safety concerns associated with the Aluminium Composite Materials found in the Trauma Building, the Trust has taken the decision to completely remove and replace the existing external cladding on the building.

1.5 To ensure the safety of the users of the Trauma Building and the wider hospital site, and to ensure that the building can resume operating fully as quickly as possible, the Applicant promptly commenced 'enabling works' on site in late March 2021 with the intention of commencing the cladding removal and replacement process in early April 2021. This planning application therefore seeks formal planning permission for the proposed development.

1.6 Alongside this process, The Trust has submitted a planning application for a new 48-bed critical care unit adjacent to the Trauma building which received a resolution to grant planning permission by Members of Oxford City Council on 3rd March 2021 (application reference 20/02983/FUL). Having regard to the fact that the new Adult Intensive Care Unit (AICU) will be positioned immediately adjacent to (and connecting with) the Trauma building, The Trust has reviewed the cladding across both buildings to ensure that it meets

the requisite fire safety standards and creates the appearance of a unified development across the frontage of both buildings.

- 1.7 The new external cladding proposed for the Trauma Building will therefore match that of the adjacent AICU, with the materials for both buildings meeting the requisite fire safety standards. Further details regarding the proposed materials and appearance of the new Trauma Building cladding are set out within this Statement.
- 1.8 This Planning, Design and Access Statement sets out a reasoned justification as to why the planning application should be permitted by reference to the proposed development in relation to its site context, planning history and the relevant planning policy framework.
- 1.9 The documents submitted in support of this planning application are as follows:

Plans and drawings

Drawing No.	Title	Revision
126369-IBI-TR-XX-PL-A-050-0001	Site Location Plan	P1
126369-IBI-TR-XX-EL-A-250-0001	Existing and Proposed Elevations	P3
126369-IBI-TR-XX-EL-A-251-0001	Front Wall Section Existing and Proposed	P2
126369-IBI-TR-XX-EL-A-050-0006	Proposed CGI View From Car Park	P1

Documents

- Completed Planning Application Form and Certificates
 - Completed CIL Form
 - Planning, Design and Access Statement prepared by Carter Jonas
- 1.10 The planning application demonstrates that the site is sustainably located and entirely suitable for the proposed development; that the proposed development accords with the National Planning Policy Framework (NPPF) and is on the whole consistent with Oxford City Council's Local Planning Policy Framework.

2.0 THE APPLICATION SITE AND SURROUNDINGS

2.1 The JR Hospital campus extends to approximately 27.7ha and is located circa 2 miles east of Oxford city centre. The surrounding context to the hospital is largely residential in nature featuring dwellings in Headington and Old Headington surrounding the site, and commercial

- elements to the south in the form of retail and convenience services situated along London Road.
- 2.2 As well as built development, areas of allotments border the hospital campus to the north east, north west and west, together with a playground and playing field to the west, an area of open space bound by trees to the south and Headington cemetery located immediately to the north.
- 2.3 The location of the proposed development is shown edged red on the accompanying Location Plan. The area bound by the red line extends to 1,370 sqm (0.137 hectares). The site is centrally located within the Hospital campus and comprises the existing Trauma Building. Immediately to the south west of the building is the new AICU which is currently under construction; to the west is surface Car Park 1 and the 3-storey MRI centre; to the east is an area of staff car parking; and to the north is an existing access road running east to west through the hospital site, further north of which is the site of the Wolfson Building and an Industrial Block.
- 2.4 As the planning application relates only to the removal and replacement of existing external building cladding, the site of the proposed development comprises only the existing Trauma Building and not any other land around it.
- 2.5 The Trauma Building itself comprises 3 storeys of hospital accommodation with a fourth level of roof plant above, which is visible from the rear of the building. The building is served by a protected stairwell at each end of the building containing a set of lifts. The ground floor of the building consists of a large open area used as a waiting room with primary bed bays and patient facilities on floors 2 and 3. In future, the building will have connections to the new AICU building to the south west.
- 2.6 The main point of access to the site is via the main JR hospital entrance from Headley Way to the west, which routes around the north western edge and into Car Park 1 which is a surface level car park. From Car Park 1, the site can be accessed by foot via an existing ramp and stairs up to the main entrance to the building on the ground floor of the Northern Elevation. In future, access into the building will also be possible from the AICU via the first, second and third floors.
- 2.7 The site is located within a fluvial Flood Zone 1 according to Environment Agency Maps, meaning that it has a low probably and negligible risk of fluvial (river) and coastal (sea) flooding, taking flood defences into consideration. The Site is at a low risk of pluvial (surface water) flooding and negligible risk of groundwater flooding.

3.0 RELEVANT PLANNING HISTORY

3.1 The JR Hospital has an extensive planning history with Oxford City Council's online records dating back to 1967 when planning applications for the first phase of the hospital (application reference 67/18982/A_H) and its vehicular access (application reference 67/19031/A_H) were submitted and approved by the City Council.

3.2 Due to the nature of the site as an operational university hospital, and the variety of different services and clinical buildings that it accommodates, Oxford City Council's online planning application register lists over 250 planning applications associated with the JR dating between 1967 and 2020. Rather than replicate the list in this statement, those planning applications of note, including those directly relating to the application site, are listed below:

- 99/01936/NO: Outline application, to include siting and means of access, for the erection of new hospital buildings comprising 39,000 sqm of floorspace together with associated provision and re-organisation of car parks to create 200 additional patient and visitor car parking spaces. Improvements to pedestrian, cycle and public transport, to include a new gated access from Saxon Way to permit bus, emergency vehicle, cycle and pedestrian access only and an internal gated access road to permit bus and emergency vehicle access only from the Osler Road entrance to and from the main hospital site. Approved April 2002.
- 01/01105/NF: Erection of 3 & 4 storey Trauma Centre building providing 3,300 sqm floorspace and plant room at 4th floor level. Enclosed single storey ground floor link to the cardiac centre building. Approved June 2003.
- 20/02983/FUL: Demolition of existing Barnes Unit and link corridor and relocation of tissue building; erection of new Adult Intensive Care Unit over 5 floors to connect to the existing Trauma Building across 4 floors; new replacement link corridor within the AICU building connecting the Trauma Building with the main hospital entrance; ancillary works; and erection of new substation in Car Park 1 at the John Radcliffe Hospital, Oxford (part retrospective). Resolution to Grant Planning Permission at Planning Committee (3.3.21). Formal decision pending.

4.0 THE PROPOSED DEVELOPMENT

4.1 The description of development for which full planning permission is sought is as follows:

“Removal of existing external cladding; erection of new external cladding to the Trauma Building at the John Radcliffe Hospital, Oxford.”

- 4.2 Specific aspects of the proposed development are described in detail below and summarised by discipline.

Design

- 4.3 The proposed development relates only to the change of the external appearance of the building in terms of its materials. No changes are proposed to the height, scale or overall massing of the building, nor is there any change to the footprint of the building.

Appearance and Materials

- 4.4 The existing external cladding for the Trauma building comprises white ‘Spanwall’ cladding and aluminium ribbon windows. This cladding creates the appearance of strong, horizontal modular banding across the building, interspersed with vertical joints. The lower level of the building is recessed and uses exposed column cladding to mimic a podium-like structure.. The upper floors of the building are complimented with Brise Soleil which protrude from the windows. The rear elevation of the building differs slightly insofar as it has a smaller cladding module, creating the effect of tighter horizontal banding across the building. The windows are of the same material but do not feature Brise Soleil. The main difference in the appearance of the rear elevation is the fact that it extends to four floors, to accommodate plant services. All of the existing cladding is proposed to be removed.
- 4.5 The proposed materials palette for the Trauma building will continue the horizontal banding/ribbon appearance of the existing building, but will use new Argeton Terracotta rainscreen cladding which will be placed over new fire-resistant backing panels. The rainscreen cladding will be in the same two ‘Terracotta’ colours as that used for the adjacent AICU building: ‘Dark Volcano Grey’ and ‘Bright Grey’.
- 4.6 To match the appearance of the AICU building, the ‘Dark Volcano Grey’ rainscreen cladding will wrap around the recessed ground floor elevations, whilst the upper floors will be in the lighter ‘Bright Grey’ cladding. The rear elevation will be solely wrapped in the ‘Bright Grey’ cladding. The proposed cladding and choice of colour palette is illustrated on the enclosed elevation drawing (reference 126369-IBI-TR-XX-EL-A-250-0001).
- 4.7 The new cladding for the Trauma building has been chosen predominantly for safety reasons, but also to ensure that it is in keeping with the future AICU building which will physically connect to the Trauma building via corridor links when fully constructed. As

demonstrated on the enclosed CGI plan (reference 126369-IBI-TR-XX-EL-A-050-0006), the use of the same external cladding ensures that the appearance of the two buildings is consistent across their frontages and, given their future corridor connections, will be read as a single unit.

- 4.8 It is important to note that the cladding and external appearance for the AICU firstly chosen to comply with fire safety regulations, but secondly, to reflect the high architectural quality and design of the Wolfson Building which opened at the John Radcliffe (JR) Hospital in March 2020. The use of the same external materials for the Trauma Building's re-cladding will ensure that it too reflects the aesthetic qualities of the Wolfson, as well as the future AICU building.

Accessibility

- 4.9 The main point of vehicular access to the site is via the main JR hospital entrance from Headley Way to the west, which routes around the north western edge of the hospital site and into surface level Car Park 1 which serves the Trauma Building. Visitors to the site in vehicles can park in Car Park 1 and access the site by foot via an existing ramp and stairs up to the Trauma building entrance on the northern elevation (the site frontage). There are no changes proposed as part of this application to the access arrangements to the building.
- 4.10 A number of additional, controlled or restricted access points provide further permeability into the hospital site from the local area for pedestrians, cyclists, buses and those with special access requirements, at various points to the north and east of the hospital grounds.
- 4.11 For pedestrians, the site is well connected with the pedestrian network within the hospital campus. The Main Hospital entrance is centrally located to connect with the wider hospital grounds and the Trauma building is located diagonally opposite the Main Hospital building to the north west. In future, the Trauma Building will also be connected to the AICU building via link corridors; and the AICU will also connect to the Main Hospital entrance via a new ground floor link corridor which is proposed as part of application reference 20/02983/FUL.
- 4.12 Visitors to the site will also be able to continue to walk to and from the Trauma building via the existing hospital pedestrian network. This includes wide footways along the main vehicle access road, supported by two zebra crossings. Access to the site from the wider area of Headington is available via the main vehicle access point to the JR, as well as via controlled or pedestrian / cycle only accesses onto Woodlands Road, Osler Road and Saxon Way.

- 4.13 For cyclists, the JR hospital priorities cycle connectivity into the hospital grounds, with segregated cycleways at the main entrance from Headley Way, as well as secondary controlled and pedestrian / cycle only entrances to the north and west of the grounds.
- 4.14 The site is also generally well served by public transport in the form of existing bus services and connections. The JR Hospital acts as a hub for bus services in the City of Oxford, as well as from the train station and Park and Ride sites, insofar as many bus services accessing the Headington area generally do so via the hospital.

Parking

- 4.15 Existing arrangements for cycle and vehicular parking to serve the site will not be affected by the proposed development, nor will there be any changes to the quantum or distribution of spaces. Cycle parking is provided throughout the JR hospital grounds, with the closest provision next to the main hospital entrance. Similarly, vehicle parking provision to serve the building will continue to be provided in Car Park 1.

Proposed Timeframes

- 4.16 The existing external cladding has been identified as flammable and dangerous. To ensure the safety of the users of the Trauma Building and the wider hospital site, and to ensure that the building can resume operating fully as quickly as possible - as it is currently closed on all bar the ground floor - the Applicant promptly commenced 'enabling works' on site in late March 2021. The process of removing and replacing the cladding is due to commence in early April 2021 and is due to complete in mid-July 2021. The building will remain 'closed' on all bar the ground floor until the works are complete.
- 4.17 The urgency of the situation has meant that the Trust has been unable to prepare and submit a full planning application; await the statutory consultation period and the formal determination of the planning application; and receive written planning approval prior to commencing development. The Trust contacted OCC's Planning Officers in February 2021 to provide prior notification of its intentions to commence the proposed development prior to the submission of a planning application. This planning application therefore seeks retrospective planning permission to regularise the position.

5.0 NATIONAL PLANNING CONTEXT

National Planning Policy Framework

- 5.1 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 (as amended).

Achieving Sustainable Development

- 5.2 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:

- a) **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;
- b) **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
- c) **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.

Presumption in Favour of Sustainable Development

- 5.3 Paragraph 10 of the NPPF identifies that: "at the heart of the Framework is a presumption in favour of sustainable development. Acknowledging 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.

Determining Applications

- 5.4 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”.

Promoting Sustainable Transport

- 5.5 Paragraph 102 of the NPPF sets out that transport issues should be considered from the earliest stages of development proposals, so that, inter alia, “opportunities to promote walking, cycling and public transport use are pursued”.

- 5.6 Supporting paragraph 103 goes on to state in addition that “development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”.

Making Effective Use of Land

- 5.7 Paragraph 117 of the NPPF sets out that “planning policies and decisions should promote an effective use of land”. Supporting paragraph 118 states that planning decisions should, inter alia:

- give substantial weight to the value of using suitable brownfield land within settlements for new homes;
- promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites would be used more effectively.

Achieving Well-Designed Places

- 5.8 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”.

- 5.9 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 undermined the quality of life or community cohesion and resilience.

Planning Practice Guidance

5.10 The Government published the Planning Practice Guidance (PPG) in 2014 and have since updated relevant parts as appropriate. The PPG provides detailed guidance on the implementation of the NPPF and is a material consideration in the determination of planning application. The following sections of the PPG have been considered in the preparation of this planning application:

- Design
- Flood Risk and Coastal Change
- Natural Environment
- Travel Plans, Transport Assessments and Statements
- Natural Environment
- Climate Change

6.0 LOCAL PLANNING POLICY CONTEXT

6.1 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.

6.2 The Development Plan for Oxford comprises the Oxford Local Plan 2036 (adopted June 2020) (hereafter referred to as 'the OLP'), site specific Area Action plans and made Neighbourhood Development Plans (NDPs), the relevant NDP in this instance being the Headington Neighbourhood Plan 2017-2032. The relevant policies of the OLP and the Headington NDP are drawn upon in the consideration of this Statement.

Oxford City Council Local Plan 2036

6.3 Policy S1 'Presumption in favour of Sustainable Development' sets out that the Council will take a positive approach to new development proposals 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.

6.4 Policy E1 'Employment Sites' states that planning permission will be granted for the intensification, modernisation and regeneration for employment purposes of any employment site provided that it can be demonstrated that the development makes the best and most efficient use of land.

6.5 Policy RE1 'Sustainable Design and Construction' requires all development proposals to incorporate sustainable design and construction principles. The policy sets out detailed carbon reduction standards for new non-residential proposals and water efficiency standards.

6.6 Policy RE2 'Efficient Use of Land' expects development proposals to make an efficient use of land and best use of available site capacity.

6.7 Policy RE4 'Sustainable Foul Drainage, Surface and Groundwater Flow' requires all development proposals 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.

6.8 Policy RE6 'Air Quality' states that 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.

6.9 Policy RE8 'Noise and Vibration' states that planning permission will only be granted for development proposals which manage noise to safeguard or improve amenity, health and quality of life.

- 6.10 Policy G7 'Protection of Existing Green Infrastructure Features' resists development proposals that result in the loss of green infrastructure features such as hedgerows or trees where it would have a significant adverse impact upon public amenity or ecological interest.
- 6.11 Policy DH1 'High Quality Design and Placemaking' seeks a good standard of urban design in new development which relates well to the character and appearance of the area and its context.
- 6.12 Policy DH2 'Views and Building Heights' relates to the Oxford skyline. The policy seeks to retain significant views both within and from outside the city, and states that planning permission will not be granted for any development that would harm the significance of Oxford's historic skyline. With regard to proposals in View Cones that may impact on roofscape and the foreground part of views must meet the criteria set out in the policy.
- 6.13 Policy DH3 'Designated Heritage Assets' states that planning proposals should respond positively to the character and distinctiveness of any heritage assets in the locality.
- 6.14 Policy M1 'Prioritising walking, cycling and public transport' supports development that minimises the need to travel and is laid out in a way that prioritises access by walking, cycling and public transport.
- 6.15 Policy M2 'Assessing and Managing Development' requires the submission of a Transport Assessment with planning applications where the proposed development is likely to generate significant amounts of movement in accordance with the requirements defined in Appendix 7.1 of the OLP.
- 6.16 Policy M3 'Motor Vehicle Parking' requires that for non-residential developments should be determined in light of the submitted Transport Assessment or Travel Plan. In the case of redevelopment of an existing or previously cleared site, there should no net increase in parking on the site and the Council will seek a reduction where there is good accessibility to a range of facilities.
- 6.17 Policy M5 'Bicycle Parking' then defines the number of required bike parking spaces to serve new developments in line with the standards set out in Appendix 7.3 of the OLP.
- 6.18 Policy SP41 'John Radcliffe Hospital Site' states that within the hospital campus area as defined on the OLP Policies Map, planning permission will be granted for:
- i. further hospital related uses, including the redevelopment of existing buildings to provide improved facilities on the John Radcliffe Hospital Site.

- ii. Other suitable uses which must have an operational link to the hospital and are:
 - employment B1(b), B1(c) and B2;
 - patient hotel;
 - extra care accommodation, including elderly persons accommodation;
 - primary health care;
 - education;
 - academic institutional
- iii. Complementary acceptable uses
 - residential development;
 - employer-linked affordable housing;
 - student accommodation;
 - small scale retail units provided that they are ancillary to the hospital

6.19 Policy SP41 goes on to state that 'Development proposals must not prejudice bus access through the site. Improvements to public transport and walking and cycling access will be required and where required by Policy M2 this should be set out within a transport assessment or travel plan and reflected in the agreed masterplan. A drainage strategy will need to be produced by the developer in liaison with the City Council, Thames Water and the Environment Agency, to establish the appropriate drainage mitigation measures for any development. Planning permission will only be granted if sufficient drainage mitigation measures are incorporated into the design of proposals.'

Headington Neighbourhood Plan 2017-2032

6.20 The Headington Neighbourhood Development Plan (NDP) was made in May 2017 and covers the period 2017 to 2032. The application site, and the wider JR campus, falls within the designated Headington NDP Area.

6.21 Neither the site nor the wider JR hospital site are bound by restrictive policies in the NDP, nor are they allocated for development. Policy TRP1 (Parking Provision at Major Employment Sites) is somewhat relevant however, as it states that proposals for additional car parking spaces for employees, which are accessible during peak periods, at major employment sites in Headington will only be supported if they can demonstrate strong evidence by the submission of a Transport Assessment that Headington's road network has adequate unused capacity at peak times.

6.22 Policy CIP2 identifies important views in the Headington Neighbourhood Plan Area which are illustrated on the Viewpoint Map in the NDP and requires development to protect these

important views. The closest important view is Number 9 'Headley Way' which is a tree lined avenue with a view out to the distant hills.

- 6.23 Policy GSP1 seeks to conserve and enhance public access to green spaces which are listed at Appendix 2 of the NDP. The closest area of green space to the proposed development is Area 30: Headington Cemetery, which is publicly accessible.

7.0 ASSESSMENT OF THE PROPOSED DEVELOPMENT

- 7.1 This section of the Planning, Design and Access Statement assesses the scheme against the planning policy framework as set out above. It also discusses other material considerations which should be taken into account when determining the application.
- 7.2 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, no material considerations arise that would come to outweigh the clear presumption in favour of the proposal, which is a defined sustainable form of development and fully compliant with the relevant provisions of the Development Plan, as detailed below.

Principle of Development

- 7.3 There is no specific policy within the OLP which deals with the safety of building materials for new developments. The site is, however, covered by Policy SP41 which allocates the JR hospital campus for further hospital related uses including the redevelopment of existing buildings to provide improved facilities. The principle of the proposed development is therefore assessed against that policy.
- 7.4 The proposed development is for the removal of the existing external cladding on the Trauma building - which has been identified as being a flammable and dangerous material - and its replacement with a new cladding material which meets up to date fire safety standards. This follows a process whereby the Applicant undertook an assessment of its existing buildings in the wake of the Grenfell Tower incident in 2017, and identified the Trauma Building as a significant fire safety risk. In response to the identified risk, the Trust immediately ceased the operation of the building on all bar the ground floor and the Applicant has since investigated options to urgently rectify the situation and bring the building back into safe use.
- 7.5 Policy SP41 expressly allows for *'further hospital related uses, including the redevelopment of existing buildings to provide improved facilities on the John Radcliffe Hospital Site.'* The

proposed development will not change the use of the Trauma building, nor will it impact on its existing floorspace or function, but it will improve the health and safety aspects of the building for not only its users, but also users of the wider JR site. This clearly falls within the ambit of '*redevelopment of existing buildings to provide improved facilities*' which is expressly permitted under Policy SP41 and therefore in local planning policy 'principle' terms, must be reasonably regarded as a permissible use at the site.

7.6 The proposal also complies with the remainder of site allocation Policy SP41 as follows:

- The proposed development will have no impact on existing bus routes of services through the site as it relates solely to the change in the use of external materials;
- The proposed development does not trigger Policy M2 as there will be no changes to the building which would result in significant changes to existing traffic movements. As a result, there is no requirement for the proposed development to deliver improvements to public transport, walking or cycling access. Moreover, given the nature of the proposed development, there is no requirement to submit a Transport Assessment or Travel Plan with the application;
- As the proposed development relates only to the change in the external cladding of the building, its existing operation will remain unchanged. As a result there is no requirement to provide a new surface water drainage assessment or foul drainage assessment in support of this planning application as the existing drainage arrangements will continue as they currently operate.

7.7 The principle of development is also supported by Policy E1 which supports the intensification, modernisation and regeneration of any employment site where development makes the best and most efficient use of land. The proposed development falls within the bracket of '*modernisation*' as it will bring the building's external materials up to date in terms of health and safety standards.

Sustainable Development

7.8 Policy S1 of the OLP 'Presumption in favour of Sustainable Development' sets out that the Council will take a positive approach to new development proposals which reflects the presumption in favour of sustainable development contained in the NPPF; and that planning applications that accord with the OLP will be approved without delay unless material considerations indicate otherwise.

- 7.9 The presumption in favour of sustainable development is at the heart of the framework (paragraph 10). There are three overarching objections to sustainable development as defined by the NPPF (paragraph 8): social, economic and environmental, all of which are interdependent and must be pursued in mutually supportive ways. The case for each is discussed below:

Social

- 7.10 The Applicant is required to undertake the proposed development as the existing external cladding on the Trauma Building has been identified as comprising a flammable and dangerous material which fails to meet the requisite fire safety standards. The building has since ceased operating as a 'Trauma' unit with only the ground floor remaining open, which has significantly reduced the JR Hospital's patient capacity.
- 7.11 The proposed development is therefore urgently required to rectify the situation, as the building currently poses a danger to the health and safety of its users and a much reduced capacity for Trauma patient care. The replacement of the cladding to a material that meets the requisite health and safety standards will ensure the building can continue to operate safely into the future to serve the community. The proposal therefore complies with the NPPF's 'social' arm of sustainable development which is to 'support strong, vibrant and healthy communities... with accessible services...that reflect current and future needs and support communities' health, social and cultural well-being.'

Economic

- 7.12 In light of the serious health and safety concerns identified with respect to the Trauma Building, the Trust is urgently taking steps to rectify the situation and remove/replace the existing cladding. Enabling works on site have already had to commence quickly to ensure that the removal of the cladding and its replacement can start in early April 2021. Unfortunately there has been no time to await the formal planning process to run its course, and the planning application at hand is now seeking to regularise the position and seek formal consent for the works.
- 7.13 The Trauma Building is currently operating at a much reduced capacity, only allowing in patients on the ground floor. This means that all facilities and equipment on the upper floors have been mothballed until the building is deemed safe for use. Without the work being undertaken as planned in early April 2021 and planning permission being sought, the Trauma building would need to remain closed, which significantly reduces the patient capacity of the JR Hospital. The proposed development therefore seeks to ensure the continued operation of the building to serve the community.

- 7.14 The proposed development wholly meets the NPPF's 'economic' strand of sustainable development insofar as it contributes to 'a strong, responsive and competitive economy' through the coordination and provision of essential infrastructure, as well as OLP Policy E1.

Environmental

- 7.15 The proposed development involves the removal of the existing external building cladding which has been identified as a fire hazard and a significant health and safety risk to its users. The development therefore proposes the wholesale removal of the existing cladding and its replacement with a new, compliant material which meets the requisite health and safety building standards. It is the same cladding as that approved for the Wolfson and AICU buildings.
- 7.16 The new cladding will not negatively impact on the energy efficiency or performance of the building nor on any surrounding biodiversity.
- 7.17 The proposed development satisfies the 'environmental' arm of sustainable development as defined by the NPPF, as well as OLP Policies RE1 and RE2.

Design and Appearance

- 7.18 The design and appearance of the building, in relation to the change in the external cladding, is entirely appropriate when considered within the context of other hospital buildings within the JR, most notably the Wolfson Building and the future AICU immediately to the south. These buildings currently (and in future, will) incorporate the same fire-resistant 'Terracotta' rainscreen cladding, with the Trauma Building and AICU building also incorporating the same colour palette.
- 7.19 The proposed development sits outside of a designated Oxford View Cone, nevertheless it is important to consider its potential visibility from views from Elsfield to the north, and the impact that any potential visibility of the building may have on the significance of these views. On the basis that the building will not change in height, and will appear more muted in appearance as the existing bright white cladding will be replaced by a more muted grey cladding, the proposed development will not create any harm in terms of landscape and visual impact (nor will it harm the Oxford skyline), and will continue to be read in the context of a collection of hospital buildings. Moreover, the roof of the building will not change in its appearance, and therefore will not stand out any more visually from afar than the existing building.

- 7.20 In accordance with OLP Policy DH1 and NPPF paragraph 124, the proposed replacement cladding presents a good standard of urban design which relates well to the character and appearance of surrounding buildings within the JR. Moreover, the building has been designed to carefully balance the requirement to provide a safe and fire resistant building, with the Applicant's desire to match the adjacent AICU building and ensure the two buildings are read as a single piece. Given the context in which the building is located within the JR campus, the proposed development is considered to accord with OLP Policy DH2 and will not adversely affect view Number 9 of the Headington NDP, in accordance with Policy CIP2.

Transport Matters

Accessibility

- 7.21 The proposed development is located within the JR hospital campus such that it will benefit from existing sustainable travel infrastructure and services and which will further be improved by the 'Access to Headington' improvements in the local area (a road infrastructure project currently being implemented by Oxfordshire County Council). The hospital encourages accessibility to the site by sustainable modes of transport, accommodating pedestrian, cycle and bus connections within the campus, and the proposed development will support this.
- 7.22 Whilst generally discouraged visitors to the site by vehicle can utilise the adjacent Car Park 1 and accessibility to the building by foot will be via the existing pedestrian walkway and ramp up to the building entrance.
- 7.23 The proposed development will not result in a change in travel activity in and around the immediate vicinity of the application site, nor will it affect the operational requirements of the building and adjacent operations. The proposed development complies with the thrust of Policies M1 and M2 insofar as the location of the building (which is not set to change) minimises the need to travel and is laid out in a way that prioritises access by walking, cycling and public transport; and also with Policy SP41 as it will not in any way prejudice bus access through the site.
- 7.24 No increase in car travel will be created by the proposed development, when compared with the trip rates generated when the building is fully operational. The only change will be during the construction phase of the project where construction vehicles will travel to and from the site, however this will be for a short period of time between April and July 2021. Moreover the number of trips generated through the construction phases are expected to be low.

Parking

- 7.25 The proposed development does not alter the current parking provision, nor does it warrant any change in the current parking arrangements in line with local planning policy standards as there is no change proposed to the floorspace or capacity of the building, nor the number of staff working within it.
- 7.26 The Trauma building is currently served by Car Park 1 which will continue to serve the proposed development. Whilst Policy M3 seeks to reduce parking provision as part of new developments, it is not appropriate to reduce the existing provision in this instance as the development only seeks to replace the external cladding of the building and not to create 'new development'. Policy M3 is clearly relates to new 'built' development. Nevertheless it is important to note that the development will not create any additional parking.
- 7.27 Nevertheless it is worth noting that the Trauma building is and will continue to be well served by sustainable transport modes and pedestrian links. The JR is also generally well served by bicycle parking, as a number of staff (approximately 30%) and visitors choose to utilise the site's excellent cycle connectivity from outside and within the site. In accordance with OLP Policy M5, the development proposals will benefit from existing cycle parking provision already available within the JR site including an additional 40 spaces recently provided adjacent to the main hospital entrance and additional spaces to be provided a the adjacent AICU. No additional bicycle parking is required as part of the proposed development.

Flood Risk & Surface Water Drainage

- 7.28 The proposed development will not in any way affect the existing drainage arrangements for the building, nor will it increase surface water run off or present increased risk of flooding. There is no requirement to submit a surface water drainage strategy with the application and there is no conflict presented with OLP Policy RE4.

Heritage

- 7.29 The JR site is located adjacent to the Old Headington Conservation Area and it is therefore important to consider any potential impact of the proposed development on its character and appearance as a designated heritage asset. The Conservation Area appraisal for Old Headington recognises the proximity of the JR hospital and the fact that any adverse impact of the 'massive, monolithic (hospital) structures' on the Conservation Area's setting are often outweighed by the public benefit that these buildings offer.

- 7.30 The proposed building is situated in the heart of the hospital campus and positioned adjacent to existing tall buildings. The proposed development will not change the height or scale of the building, the only change will be the colour of the external cladding. In that respect it will change from a bright white to a more muted grey, which is considered to present an improvement in landscape and visual impact terms as the visibility of the building from afar will be reduced. The proposed development is not anticipated to have a detrimental impact on the Old Headington Conservation Area. The proposed development therefore accords with Policy DH3.

Arboriculture

- 7.31 There are no existing trees within the application site, nor will the proposed development have an impact on (or result in the loss of) trees close to the site. Moreover, the proposed development relates only to the removal and re-cladding of the building, therefore there is no reason or opportunity to consider the need for additional planting as part of the application. The proposed development therefore complies with OLP Policy G7.

Air Quality

- 7.32 The site is located within an Air Quality Management Area (AQMA). However, the operational phase of the proposed development will not result in the release of pollutants nor will it exceed air quality objectives for particulate matter or nitrogen dioxide. Moreover given the nature of the proposed development, there is no requirement to include measures to reduce patients', employees' or residents' exposure to air pollution. In accordance with OLP Policy RE6, no mitigation is required to support the proposed development as the air quality objectives are predicted to still be met as per the operation of the current Trauma Building.
- 7.33 The Applicant will also seek to ensure that the construction phases of the development minimise the release of dust into the atmosphere, having regard to the site's location within an AQMA.

Noise

- 7.34 In accordance with OLP Policy RE8, the operational phases of the proposed development will have no discernible impact on noise levels from the building and as such, no harm will be caused to the amenity and quality of life of residents neighbouring the site, nor for occupants within the site itself. The Trust will also seek to ensure that noise levels during the course of the re-cladding works are kept to a minimum to avoid causing disruption, although the overall duration of these works will be minimal.

8.0 SUMMARY & CONCLUSIONS

- 8.1 The proposed development is for the removal of the existing external cladding at the Trauma Building at the JR Hospital in Oxford, and its replacement with a new fire-resistant material. The development is required in response to an investigation carried out on behalf of the Trust into the fire safety standards of its buildings in light of the Grenfell Tower incident of 2017. The investigation highlighted the presence of Aluminium Composite Materials used in the building and as such, the Trauma building has remained largely out of use since the risk was identified. The only element of the building currently operating is the ground floor, for in-patients only. As the building is currently operating at a reduced capacity, The Trust must complete the re-cladding works as quickly as possible to rectify the situation and to allow the Trauma building to fully re-open by mid-July 2021.
- 8.2 The proposed development is therefore to completely remove the existing cladding and replace it with a material which meets the requisite fire safety standards. This is the same material as that recently approved for the Wolfson building and adjacent AICU building at the JR Hospital. No other changes are proposed to the building as part of this planning application.
- 8.3 The principle of the proposed development is established at a local planning policy level by Policy SP41 of the OLP, which allocates the JR hospital campus – including the site of the proposed development – for further hospital related uses including the redevelopment of existing buildings to provide improved facilities. The proposed removal of the existing cladding and its replacement with a new, safer material clearly falls within the bracket of ‘providing improved facilities’ as set out within the Policy and therefore in policy principle terms, must be reasonably regarded as a permissible use at the site.
- 8.4 The proposed development has also been demonstrated to be sustainable in accordance with the economic, social and environmental pillars of sustainable development as defined by the NPPF. Building on this at a local planning policy level, Policy S1 of the OLP ‘Presumption in favour of Sustainable Development’ sets out that planning applications that accord with the OLP will be approved without delay unless material considerations indicate otherwise.
- 8.5 It has been set out above that the development has been designed to accord with the relevant policies of the development plan regarding matters such as design and appearance, transport and accessibility, noise and air quality, amongst other aspects of the development.

- 8.6 There are no known material considerations which stand against the proposals. In the circumstances set out above and taking into account the local and national planning policy context sitting behind the proposals, it is very much hoped that the proposal can be supported and planning permission granted.