



UYS, Cowley, Oxford

Planning Statement

HTA Design LLP on behalf of
Charterhouse Property Group

March 2024



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Planning Statement

UYS, Cowley, Oxford

1. Introduction

- 1.1 This Planning Statement has been prepared by HTA Design LLP ('HTA') on behalf of Charterhouse Property Group (the 'Applicant') as part of an application for detailed planning permission for up to 22,375sqm open storage (Use Class B8) on land at the UYS Oxford Site, Cowley, OX4 2BW (the 'Site'). A Site Location Plan is enclosed at **Appendix 1**.
- 1.2 The Site falls within the administrative boundaries of Oxford City Council (OCC), who are the determining Local Planning Authority.
- 1.3 The planning application seeks detailed planning permission for the following:

'Development of up to 22,375sqm open storage (Use Class B8) together with associated highways works, site-wide hard and soft landscaping works, and boundary treatment.'

- 1.4 The development proposals are hereafter referred to in this Planning Statement as the 'Proposed Development'. A full description of the Proposed Development is set out in **Section 3** of this Statement.

Application Overview and Accompanying Documents

- 1.5 This Planning Statement includes the description of development for which planning permission is sought and explains how the Proposed Development responds to relevant planning policies contained in the development plan. It also deals with site-specific technical issues to be dealt with through the planning process and draws from the conclusions of the environmental and technical documents which accompany the application.
- 1.6 This Statement should be read in conjunction with the following drawings submitted as part of this application:

Drawing Reference	Drawing Title	Scale	Status
0100	Site Location Plan	1:2500	For Approval
3000	Site Plan - Existing	1:1000	For Approval
3001	Elevations - Existing	1:500	For Approval
3002	Site Plan - Proposed	1:1000	For Approval
3003	Elevations - Proposed	1:500	For Approval

Table 1.1: List of Accompanying Drawings

- 1.7 In addition, the documents submitted to accompany this application are as follows:

Document	Author	Comments
Planning Application Form	HTA Design	Submitted via the Planning Portal.
CIL Form 1: Additional Information	HTA Design	
Application Covering Letter	HTA Design	
Air Quality Assessment	Anderson Acoustics	
Arboricultural Method Statement and Tree Survey	Arbtech	
Biodiversity Net Gain Assessment	Arbtech	
Ecological Impact Assessment	Arbtech	
Flood Risk Assessment	Colliers	
Drainage Strategy	Morgan Structural Limited	
Geo-Environmental Investigation Report	WDE Consulting	
Noise Impact Assessment	Anderson Acoustics	
Transport Statement	Calibro	

Table 1.2: List of Accompanying Application Documents

Statement Structure

- 1.8 This Planning Statement is structured as follows:
- **Section 2** describes the Site, surrounding context and planning history.
 - **Section 3** sets out the background to the Proposed Development.
 - **Section 4** provides a summary of the relevant planning policy context.
 - **Section 5** outlines how the Proposed Development responds to policy, as well as other material considerations.
 - **Section 6** identifies the planning obligations and CIL requirements.
 - **Section 7** sets out the summary and conclusions to this Planning Statement.

2. Application Site and Surrounding Context

- 2.1 The Site is located immediately to the east of the Unipart Group and Mini sites in Cowley and forms the eastern extremity of a large industrial estate along the south-eastern administrative boundary of OCC in the Ley Valley Ward. The Site is located approximately six kilometres east of Oxford City Centre and sits between the neighbourhoods of Cowley (550 metres to west) and Horspath (450 metres to the north-east).

The Site

- 2.2 The Site is approximately 2.83 hectares in size and is comprised of the existing UYS warehouse building, the adjacent ancillary building and associated surface-level car parking immediately to the north. UYS ceased operations on the Site in July 2021 due to the closure of Honda UK and so Site has been vacant since.
- 2.3 The main building is an industrial warehouse, built in 1997 under application ref. 96/01703/NR and is three stories in height. The warehouse building is clad with standard metal sheets.
- 2.4 The single storey ancillary building was built in 2019 under application ref. 18/03060/FUL to provide additional operational facilities.
- 2.5 The Applicant recently applied and received prior approval for the demolition of the existing buildings on the Site. It is anticipated that the demolition works will commence in May 2024 and be completed by November 2024.
- 2.6 Approximately 135 car parking spaces are provided to the northwest of the building.
- 2.7 There is currently limited access to the Site with indirect vehicular access through shared one-way road accessed from Garsington Road along Transport Way. This access point includes security points operated by Unipart at the main entrance off the B480.
- 2.8 Land to the north of the Site is formed of a disused rail cutting and dense planting along with a former bridge structure that is not currently in use. On the other side of the rail cutting is Oxford Road, which connects the village of Horspath and the Eastern By-Pass Road (A4142).
- 2.9 Immediately to the south there is an overgrown spoil heap created from site scraping. The western edge of the Site is formed of a former servicing yard that historically formed part of the adjacent Unipart site. Access into the Site from the Unipart site is to the north-west adjacent to the car park.
- 2.10 The site is surrounded to south and east beyond by open fields which are predominantly agricultural. The Site is visually screened from its surroundings through dense tree planting to the north along the disused rail embankment and along the eastern edge by a gabion retaining wall with mature planting above. Hollow Brook runs parallel to the eastern boundary of the Site on the other side of dense trees.

The Surroundings

- 2.11 In terms of surrounding context, the Site sits within an area of the City that is predominantly characterised by large-scale strategic industrial and employment uses such as the BMW Group and Unipart sites immediately to the west, beyond which lies the Oxford Business Park on the other side of the Eastern By-Pass Road. Slightly further beyond to the south is the Oxford Science Park.
- 2.12 The Site is bordered to the north and west by the Green Belt, predominantly located within the administrative boundary of South Oxford District Council (SODC).
- 2.13 There are several development proposals coming forward, which will change the nature and character of the Site's immediate surroundings. To the north, a planning application has recently been approved for the development of land on Oxford Road for an outdoor sports complex (Oxford Sports Park), which will facilitate the relocation of existing facilities on land immediately adjacent to the west on Roman Way for expansion of operations at the BMW Mini factory (planning application ref. 18/01385/VAR and 16/03078/FUL). This development has recently been completed and is now in operation.
- 2.14 The land directly east of the Site is designated as Green Belt in the South Oxfordshire Local Plan (2035). Neighbourhood plans for the relevant areas (Horspath to the east of the Site and Garsington to the south) are currently in the early stages of preparation, however the South Oxfordshire Local Plan indicates that some form of development may come forward on land immediately to the east of the Site.
- 2.15 Land immediately to the south of the Site has been removed from the Green Belt and allocated to deliver approximately 1,800 new homes and supporting services and facilities within the plan period under Policy STRAT 12: Land at Northfield. The 68-hectare site will be expected to deliver:
- Approximately 1,800 new homes including a provision of affordable housing and family-sized accommodation.
 - Educational facilities, likely to include entry primary school and contributions towards an off-site secondary school and Special Education Needs (SEN) alongside other financial contributions.
- 2.16 Further south, the South Oxfordshire Local Plan includes a strategic allocation at Grenoble Road covering 153 hectares of land to deliver 3,000 new homes, of which 2,480 are expected to come forward within the plan period (STRAT 11). The site is also expected to deliver 10 hectares of employment land incorporating an extension to the Oxford Science Park, a Park and Ride site adjacent to the A4074 and supporting services and facilities.

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2.17 Given the broader strategic significance of this part of Oxford, the Site is located within an important position within the 'OXCAM Arc', the 'Oxfordshire Knowledge Spine', and 'England's Economic Heartland', a region with an ambitious growth plan for future high skill business development and employment opportunities.

Relevant Designations

2.18 The Site is allocated in the Oxford Local Plan (2020) as a Category 1 employment site (Policy SP7: Unipart) and is identified as being an important site in providing employment land to deliver the objectives of the Local Plan. The site allocation allows for B1, B2 and B8 employment uses, with other complementary considered on their merits. Policy SP7 also notes that opportunities should be sought to enhance and promote more sustainable travel modes to the wider Unipart site (including the proposal Site).

2.19 The Category 1 employment site is also protected by Policy E1 (Employment Sites), which seeks to support development seeking intensification, modernisation and regeneration for employment purposes of any employment site if it can be demonstrated that the development makes the best and most efficient use of land and does not cause unacceptable environmental impacts and effects.

2.20 The Site is adjacent to the Cowley Branch Line Area of Change (AOC) under Local Plan Policy AOC7, which is defined as being a major employment hub including the large employers of BMW Group, Unipart, Oxford Science Park and Oxford Business Park, as noted above. Policy AOC7 is supportive of development within the AOC where it would take opportunities to make more efficient use of space through intensification of existing sites, rationalisation of parking and reduction in surface-level car parking, and improved connectivity between different parts of the area. High density residential and employment development that makes efficient use of land will be expected in the AOC.

2.21 The Site is not within or near any designated Conservation Areas or statutorily or locally listed buildings. The closest listed building is the Grade II Bankside Cottage located approximately 410 metres to the north-east off Oxford Road.

2.22 The Site lies within Flood Zone 1, meaning there is less than 1 in 1,000 annual probability of flooding.

Planning History

2.23 A review of the online planning register held by OCC has identified a number of historic planning applications for the Site relating primarily to its industrial use, as summarised in **Table 2.1** below.

2.24 It can be taken from the planning history below that the Site has been historically used for industrial purposes. The earliest record suggests the Site was used for industrial storage (use class B8) following approval in 1980. In 1997, approval was granted to erect the building currently existing on-site for industrial purposes relating to the Unipart operations. The building also incorporated a two-storey office element which was approved later in 1997. In 2011, a single storey loading bay was approved, alongside a warehouse building in 2015.

2.25 More recently a planning permission was approved for the temporary change of use of the existing UYS Building from general industrial (Use Class B2) to storage and distribution (Use Class B8) for a period of 5 years, in November 2022. Upon the expiration of the temporary change of use in 2027, the building will revert back to its original use (B2).

2.26 Following this, a planning application for a number external works, to render the building operational, was approved.

2.27 The planning history clearly demonstrates that the principal of industrial and storage uses of the Site is firmly established.

Application Ref.	Description	Decision
80/00572/SON	Use of land for storage of motor vehicles (Site of Unipart Yutaka).	Approved November 1980
82/00613/SON	British Leyland Motor Corporation Limited Watlington Road - Use of land for storage of motor vehicles	Approved January 1983
86/00823/PN	Use of land for storage of motor vehicles (Site of Yutaka, Oxford Road).	Approved January 1987
90/00741/SON	Erection of a 2.5 metres high galvanised steel 'D' section palisade fence around the perimeter of the site.	Approved December 1990
93/00741/NF	External alterations and formation of lorry park (Unipart DCM Depot)	Approved August 1993
95/01752/NOY	Outline application for the erection of building for general industrial (Class B2), with access, parking and landscaping.	Approved October 1996
96/01703/NR	Erection of building for industrial purposes, parking for 197 cars & 60 bicycles with access from Oxford Rd, Garsington (details of siting, design, external appearance, access & landscaping reserved under 95/1752/NOY) (Amended plans)	Approved February 1997

96/01704/VF	Variation of condition 12 of outline approval 95/1752/NOY. (To remove mounds to create a car park)	Approved February 1997
97/00333/NF	Change of use from car storage to car parking and access ancillary to factory building on adjoining land approved under ref 96/01703/NR & construction of service road.	Approved April 1997
97/00393/NF	Revisions to approved design to incorporate 2 storey office element (plus ancillary facilities) as part of factory building (864sq m. additional office floor space over & above approved scheme). (Variation to permission 96/1703/NR)	Approved April 1997
10/03317/FUL	Erection of single storey loading bay at existing loading bay.	Approved February 2011
15/02262/FUL	Erection of warehouse building on existing car parking area.	Approved October 2015
15/02262/NMA	Non-material amendment of planning permission 15/02262/FUL to amend gable elevations from 2 x 15m wide portal frames to 1 x 30m wide portal frame	Approved November 2015
15/02262/CND	Details submitted in compliance with conditions 3 (Materials), 6 (Tree Protection Plan), 7 (Construction Traffic Management Plan), 8 (Revised Drainage Details) and 10 (Cycle Shelter) of planning permission 15/02262/FUL	Approved November 2015
18/03060/FUL	Erection of aluminium framed loading bay building on rear section of car park.	Approved February 2019
22/01712/FUL	Temporary change of use of the existing UYS Building from general industrial (Use Class B2) to storage and distribution (Use Class B8) for a period of 5 years.	Approved November 2022
23/00388/FUL	Demolition of 2no. canopies to north elevation and formation of 1no. canopy to main entrance. Replacement cladding to all elevations. Replacement cladding and rooflights to all roofs. Replacement window and fire exit doors.	Approved April 2023
24/00367/DEM	Application to determine whether prior approval is required for the method of demolition.	Approved March 2024

Table 2.1: Site Planning History

3. The Proposed Development

3.1 This section summarises the Proposed Development. Full details of the Proposed Development are set out in the supporting drawings and technical documents that accompany this application.

Development Context

- 3.2 As noted in Section 2 of this Statement, UYS ceased operations on the Site in July 2021 due to the closure of Honda UK and the Site has remained vacant since this time.
- 3.3 The Applicant previously obtained consent for a temporary change of use of the Site from B2 to B8 in 2022, allowing the existing UYS building to be utilised as a warehouse/ storage facility on a temporary basis (ref. 22/01712/FUL). Subsequently, approval was granted for a series of external works aimed at restoring the building's condition to attract potential tenants (ref. 23/00388/FUL). However, despite these efforts, the building's age and inefficiency has resulted in a lack of interest from prospective tenants regardless of there being an extant permission for works to improve its condition.
- 3.4 The Applicant has longer-term aspirations for the redevelopment of the wider site that forms part of the site allocation (Policy SP7: Unipart), comprised of both the UYS Site and adjacent land. The aim is to develop a comprehensive masterplan which brings forward a modern employment-led intensification of the wider site, in alignment with the aspirations of Policy SP7 of both the existing and emerging Local Plans. Whilst the Applicant has held initial discussions with the LPA regarding longer-term proposals, the complex nature of any redevelopment and the involvement of multiple landowners necessitates a collaborative approach, which inevitably demands additional time to fully materialise.
- 3.5 As a consequence, the Applicant has explored alternative ways of putting the Site back into active use in the short-term and has identified local market demand for open storage space. To facilitate this, the Applicant has recently secured prior approval for the demolition of the existing buildings (ref. 24/00367/DEM), with demolition works scheduled to commence in May 2024.

Development Proposals

- 3.6 The Proposed Development allows for up to 22,375sqm of storage space (Use Class B8) on the Site. It is anticipated that the proposed use will be on a temporary basis, until discussions with neighbouring landowners yield a coordinated strategy for wider redevelopment. As such, the proposed temporary use is projected to last for a period of 10 years.
- 3.7 To facilitate this, nine existing, Category C trees (as illustrated on the accompanying Arboriculture Method Statement) are proposed to be removed and replaced with hardstanding to cover the surface of the plot, which will be used as the basis for the storage proposed.
- 3.8 Soft landscaping works are proposed in the form scrub planting and additional small trees to be planted at the south-eastern and north-western boundaries of the Site.
- 3.9 Existing arrangements for site access will remain as currently. Access to the Site will continue to be gained via the access road from Garsington Road via the Unipart site. Figure 3-1 of the accompanying Transport Statement demonstrates the site access and egress strategy via the main access. Employees will have access to six designated car parking spaces.
- 3.10 Given the absence of a confirmed prospective tenant, the open storage facility is proposed as a 24-hour operation. This is aligned with historic B2 use of the Site by the previous tenant. This flexibility will accommodate a range of potential tenants and enhance the appeal of the facility.

4. Planning Policy Context

- 4.1 This section outlines the relevant planning policy context for the Proposed Development at national and local levels and considers the statutory development plan policies against which the Proposed Development should be considered, as well as other material considerations.
- 4.2 The policy context is set out below under the following headings.
- Statutory Development Plan Policy.
 - Material Planning Considerations.

Statutory Development Plan Policy

- 4.3 The Town and Country Planning Act 1990 (referred to as ‘the Act’), the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the principal statutory considerations for town planning in England.
- 4.4 Collectively the three acts create a plan-led system which requires local planning authorities to determine planning applications in accordance with an adopted statutory development plan unless there are material considerations which indicate otherwise (Section 38(6) of the 2004 Act as amended by the Localism Act).
- 4.5 In this instance, the statutory development plan relevant to the Application Site comprises the Oxford City Council Local Plan (2020).
- 4.6 Other material considerations include:
- The National Planning Policy Framework (2023);
 - The National Planning Practice Guidance (2023);
 - Oxford Air Quality Planning Application Guidance.

Oxford City Council Local Plan (2020)

- 4.7 The Oxford Local Plan was adopted in June 2020 and is part of the Oxford City Council Local Development Plan (2016 – 2036), which sets out the vision for Oxford.
- 4.8 The main aim of the Local Plan is to set out a vision for Oxford for the next 20 years and beyond, giving consideration to how it can best address the pressures and challenges the City faces. The Local Plan seeks to ensure growth and development at Oxford, whilst ensuring that this growth will be associated with a liveable and sustainable environment that balances economic, social and environmental needs, ensuring that the city remains a highly desirable place to live, work and visit. The Local Plan guides and shapes new developments and contains detailed policies which planning applications are to be judged against.
- 4.9 Addressing the issue of housing in the City is a key priority of the Plan, whilst also seeking to support the growth in the Oxford economy in key sectors linked to its economic strengths and contributing to advancements in learning and innovation locally, nationally and globally.
- 4.10 The following Local Plan policies are considered to be of most relevance to the determination of this planning application:
- 4.11 **Policy S1: Presumption in favour of sustainable development highlights** that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework when considering development proposals.
- 4.12 It will work proactively with applicants to find solutions jointly which mean that applications for sustainable development can be approved where possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 4.13 **Policy E1: Employment sites** sets out that Planning permission will be granted for the intensification, modernisation and regeneration of employment sites, for employment purposes, if it can be demonstrated that the development makes the best and most efficient use of land and does not cause unacceptable environmental impacts and effects. The policy also sets out that planning permission will not be granted for development that results in any loss of employment floorspace on Category 1 sites. No other non-employment uses will be permitted on Category 1 sites except:
- a) residential development for staff linked to the employer (where this is permitted under Policy H3); or*
 - b) other complementary uses that support the successful economic function of the site.*
 - c) Start-up or incubator businesses will also be supported, if it can be demonstrated that they will not cause any negative impact on the main economic function of the site.*
- 4.14 **Policy RE2: Efficient use of land** indicates that planning permission will only be granted where development proposals make efficient use of land. The Policy notes that development proposals must make best use of site capacity, in a manner compatible with the site itself, the surrounding area and broader considerations of the needs of Oxford, whilst proposing an appropriate density, an appropriate scale and form.
- 4.15 **RE7: Managing the Impact of Development** states planning permission will only be granted for development that ensures that the amenity of communities, occupiers and neighbours is protected; does not have unacceptable transport impacts affecting communities, occupiers, neighbours and the existing transport network; and provides mitigation measures where necessary.

- 4.16 **Policy RE8: Noise and vibration** indicates that 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 or to 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
- 4.17 **Policy M2: Assessing and managing** development requires that Transport Assessments must submitted in support of development likely to generate significant amounts of movement. A TA must assess the multi-modal impacts of development proposals and demonstrate the transport measures which would be used to mitigate the development impact to ensure that the development does not negatively impact the local highways network. A Travel Plan will be required from development that is likely to generate significant amounts of movement
- 4.18 **Policy M3: Motor vehicle parking** sets out that the parking requirements for all non-residential development, whether expansions of floorspace on existing sites, the redevelopment of existing or cleared sites, or new non- residential development on new sites, will be determined in the light of the submitted Transport Assessment or Travel Plan, which must take into account the objectives of this Plan to promote and achieve a shift towards sustainable modes of travel. The presumption will be that vehicle parking will be kept to the minimum necessary to ensure the successful functioning of the development.
- 4.19 **Policy SP7: Unipart** sets out that planning permission will be granted for B1, B2 and B8 employment uses at the Unipart site. Other complementary uses will be considered on their merits. Opportunities should be sought to enhance and promote more sustainable travel modes to the Unipart site.

Material Planning Considerations

The National Planning Policy Framework (2023)

- 4.20 The National Planning Policy Framework (NPPF) is an overarching document which seeks to establish a national planning policy agenda focused specifically upon the delivery of sustainable development. It must be considered in the preparation of local and neighbouring plans and is a material consideration in decision making.
- 4.21 Paragraph 7 sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 then sets out that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:
- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
 - a social objective – 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 well-designed, beautiful, and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
 - an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 4.22 These objectives should be delivered through the preparation and implementation of plans and the application of policies in the framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 4.23 In accordance with Paragraph 11, at the heart of the NPPF lies a presumption in favour of sustainable development. For decision taking, this means approving proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 4.24 Paragraph 33 of the NPPF requires policies in local plans and spatial development strategies to be reviewed at least once every five years to assess whether they need updated. Reviews should take into account changing circumstances affecting the area, or any relevant changes in national policy.

Building a Strong, Competitive Economy

- 4.25 Paragraph 82 of the NPPF provides that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 4.26 Paragraph 83 refers to how planning decisions should recognise and address the specific locational requirements of different sectors and refers to making provision specifically for storage and distribution operations at a variety of scales.
- 4.27 Paragraphs 84 and 85 refer specifically supporting a prosperous rural economy, referring in Paragraph 84 to planning decisions enabling the sustainable growth and expansion of all types of businesses in rural areas. Paragraph 85 identifies that planning decisions should ensure development in rural areas which meets local business needs does not have an unacceptable impact on local roads and exploits opportunities to use sites which are physically well-related to existing settlements.

Making Effective Use of Land

- 4.28 Paragraph 119 of the NPPF sets out that planning decisions should promote an effective use of land in meeting the need for homes as well as other uses, whilst safeguarding and improving the environment and ensuring healthy living conditions. This is also reflected in Part A of paragraph 120, which notes that planning decisions should encourage multiple benefits from urban and rural land.
- 4.29 Paragraph 123 is clear that LPAs should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.

Achieving Well-Designed Places

- 4.30 The creation of high-quality, beautiful, and sustainable buildings and places is discussed in Paragraph 126 of the NPPF. Good design is fundamental to what the planning process should achieve and is a key aspect of sustainable development. Being clear about design expectations is essential for achieving this. Paragraph 130 sets out that planning decisions should ensure that developments are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping, and that they are sympathetic to local character and history including landscape setting.
- 4.31 Paragraph 131 sets out that streets should be tree-lined, and that trees should be incorporated in new developments given their important contribution to the character and quality of urban environments and can also help mitigate the impacts of climate change.

Meeting the Challenge of Climate Change, Flooding, and Coastal Change

- 4.32 The NPPF is clear that the planning system should support the transition to a low carbon future in a changing climate. Paragraph 154 states that new development should be planned for in ways that: avoid increased vulnerability to the range of impacts arising from climate change; and can help to reduce greenhouse gas emissions, such as through its location, orientation and design.

Conserving and Enhancing the Natural Environment

- 4.33 In terms of habitat and biodiversity, Paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside and minimise impacts on and provide net gains for biodiversity.
- 4.34 Paragraph 180 states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative Site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 4.35 In terms of pollution, Paragraph 185 states planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the Site or the wider area to impacts that could arise from the development.

The Proposed Submission Draft Local Plan (2040)

- 4.36 The Pre-Submission Publication version of the Oxford City Council Local Plan (2040) was published for consultation (Regulation 19) in November 2023, and consultation remained open until January 2024. Once adopted, the new Local Plan will replace the existing Local Plan. The policies in the emerging Local Plan closely relate to the Council's existing adopted policies and are consistent with national policy in the NPPF.
- 4.37 **Draft Policy E1: Employment Strategy**, sets out that new development on employment sites should demonstrate that it is making the best and most efficient use of land and premises and that it positively promotes sustainable development through the upgrading and re-use of existing.
- 4.38 **Draft Policy E2: Warehousing and Storage Uses**, indicates that planning permission will only be granted for new or expanded warehousing and storage uses if it is within an existing employment site (of any category) and where it can be demonstrated in the planning application that the use is essential to support the operational requirements of a Category 1 employment site. Where this is not the case, the suitability of the proposals will be assessed against the site specific circumstances.
- 4.39 **Draft Policy SP7: Unipart**, mirrors the existing site allocation. The draft policy sets out that permission will be granted for new development, modernisation and intensification of office (Class E), warehousing (Class B8) and general industrial (Class B2) employment uses. New development needs to make the most efficient and effective use of the land in accordance with Policy E1 (employment sites) and in recognition of its importance as a Category 1 employment site. The draft policy also sets out that other complementary uses will be considered on their merits.
- 4.40 In addition to the policies referred to above, the following draft policies in the Pre-Submission Publication version of the Local Plan are also considered to be of most relevance to the determination of this planning application:
- Policy S1: Spatial Strategy and Presumption in Favour of Sustainable Development
 - Policy G1: Protection of the Green Infrastructure
 - Policy G4: Delivering mandatory net gains in biodiversity
 - Policy G7: Flood risk and Flood Risk Assessments (FRAs)
 - Policy G8: Sustainable Drainage Systems (SuDS)
 - Policy R4: Air quality assessment standards

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- Policy C6: Transport Assessments, Travel Plans and Service Delivery plans
- Policy C8: Motor Vehicle Parking Design Standards.

4.41 Given the relatively advanced stage of the plan-making process following consultation on the Regulation 19 version of a Local Plan, the draft planning policies contained in the Pre-Submission Draft of the Oxford City Council Local Plan can be given weight as a material consideration in appraising the Proposed Development.

5. Compliance with Development Plan Policy

- 5.1 This section identifies the key planning considerations and assesses the Proposed Development against the adopted and emerging development plan policy and other material considerations. It should be read together with the drawings package and other supporting technical assessments accompanying this application, which collectively provide further detail on how the Proposed Development is being delivered and how it is compliant in planning policy terms.

Principle of Development and Land Use

- 5.2 This section discusses the acceptability of the use of the Site for storage purposes under Use Class B8.
- 5.3 At the heart of the NPPF lies a presumption in favour of sustainable development. The NPPF also supports planning decisions that help create the conditions in which businesses can invest, expand and adapt, and which recognise and address the specific locational requirements of different sectors, referring specifically to storage and distribution operations at a variety of scales. The NPPF also seeks to create and support a prosperous rural economy, enabling sustainable growth and expansion of all types of businesses in rural areas.
- 5.4 The Site is allocated in the Local Plan through Policy SP7, which is designated to bring forward B1, B2 and B8 employment uses, along with other possible complementary uses. The Site is also allocated as a Category 1 Employment Site. This is mirrored in draft policy SP7 of the emerging draft Local Plan.
- 5.5 Policy E1 (Employment Sites) of the Local Plan sets out that planning permission will be granted for the intensification, modernisation and regeneration for employment purposes of any employment site if it can be demonstrated that the development makes the best and most efficient use of land and does not cause unacceptable environmental impacts and effects.
- 5.6 Policy E1 also notes that on Category 1 sites, planning permission will not be granted for development that results in any loss of employment floorspace. Other complementary uses could be supported if it is demonstrated that they could support the successful economic function of the site.
- 5.7 The same policy also sets out that B8 uses are generally not acceptable on Category 1 employment sites as they have low employment densities. However, the policy also notes that B8 uses could be allowed in exceptional circumstances, where the B8 use is essential to support the operational requirements of a Category 1 employment site and that the Council will assess the suitability of the proposed use against the site-specific circumstances. Notwithstanding, the site allocation allows for B8 uses on the Site and it is therefore considered the Proposed Development is in accordance with the site allocation.
- 5.8 As previously noted, the Site has been vacant since July 2021, following the closure of Honda UK, and is not currently providing any active employment use.
- 5.9 The Applicant is currently engaged in discussions regarding the longer-term redevelopment of the wider site.
- 5.10 Whilst the Applicant has held initial discussions with the LPA regarding the Site's longer-term potential, the complex nature of redevelopment and the involvement of multiple landowners necessitates a collaborative approach, which inevitably demands additional time to fully materialise.
- 5.11 As such, leaving strategic Category 1 employment floorspace unoccupied during this period is not an efficient and economically viable use of land in the short term. To put the site into an active and efficient use, the Applicant is proposing to let the premise as open storage (Use Class B8) whilst proposals for the wider redevelopment are being developed and considered through a robust design and planning process.
- 5.12 Although the Applicant initially marketed the building as a warehouse storage facility (Use Class B8), subsequent to receiving consent for a temporary change of use from B2 to B8, it has become evident that the age, condition and efficiency of the building does not appeal to potential tenants. Consequently, despite an extensive marketing effort, no tenants were secured during the protracted marketing period.
- 5.13 However, this marketing period highlighted a strong and unmet demand within the market for open storage facilities. Several B8 operators have shown interest in the Site, as it could be easily used for storage and distribution purposes without needing investment to alter the existing site access.
- 5.14 The proposals would therefore address an identified market demand in the City by providing much needed B8 open storage floorspace, whilst making viable use of an important employment site.
- 5.15 The proposed change of use is aligned with the aspirations of site allocation SP7 (Unipart) which supports development on the Unipart site that will bring forward B1, B2 and B8 employment uses. It is also noted that temporary use of the Site for a B8 use has previously been approved by OCC and is therefore demonstrated to be acceptable in principle.
- 5.16 Although Policy E1 suggests that B8 uses are not preferable on Category 1 employment sites, it also suggests that B8 uses will be considered where certain circumstances apply.
- 5.17 Whereas the Site currently lies vacant and does not provide any jobs, the Proposed Development would provide approximately 6 jobs, based on TRICS data. This would be a significant uplift from the current situation and would contribute to the overall job market in Oxford.
- 5.18 It is considered that bringing a vacant site into use for a local business for a temporary period of time, and to provide a number of jobs, is a sustainable use of the Site, and is in accordance with the presumption in favour of sustainable development, set out in local and national policy.

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- 5.19 In summary, the Proposed Development will provide much-needed additional open storage space on a Site in a location which has a long-established use for industrial and commercial purposes, as recognised by the Council in adopted and emerging planning policy. The proposed space will provide opportunities for existing local businesses to expand or consolidate their activities.
- 5.20 The Proposed Development reflects sustainable economic growth in line with the Council's objectives for sustainable development to encourage the local economy. It also accords with the existing and emerging planning policy view that the Site is a designated Category 1 Employment site, where proposals for B8 use and other complementary uses will be granted upon merit, which is considered in further detail below.
- 5.21 Overall, the principle of development is firmly established and aligns with the ambitions and objectives of adopted and emerging planning policy on both national and local scales.

Design, Character, and Appearance

- 5.22 Placemaking and good design are high on the government's agenda for planning. The NPPF makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 130 outlines that development should be visually attractive as a result of good architecture, layout, and appropriate and effective landscaping, which is sympathetic to local character and history, including landscape setting.
- 5.23 At local level, Local Plan Policy RE2 sets out that the LPA will only support developments that make efficient use of land, provided that the scale of development coming forward is compatible with the nature of the site.
- 5.24 The Proposed Development is located within the wider Unipart site, which is recognised as an industrial site both within the adopted and emerging Local Plans, with a long-established industrial history. The development in question would result in storage activity which is aligned in character and appearance to the nature of the wider site.
- 5.25 The Site is located within a predominantly rural setting. It is unlikely that the storage activity would be visible to the public as the site is only accessible via a gated access through the Unipart site. Any views from the public highways would be interrupted by stretches of land, changes in topography, and dense mature trees to the south and east of the site.
- 5.26 Notwithstanding, The Proposed Development will improve the character and appearance of the Site and minimise harm to the surrounding landscape through enhancements to existing planting, additional tree planting to the south-eastern and north-western boundaries of the Site.

Noise

- 5.27 A Noise Statement has been prepared by Anderson Acoustics in support of this planning application, which compares the expected noise levels of the B8 use to the noise generated from the B2 use during its operation by UYS.
- 5.28 The report finds that there is an anticipated substantial reduction in overall traffic flows, from 1,673 daily movements to 201, along with a corresponding decrease in the percentage of heavy vehicle movements. To assess the potential significance of this reduction, brief calculations were conducted following the methodology outlined in 'A Guide to Measurement and Prediction of the Equivalent Continuous Sound Level Leq'.
- 5.29 According to this method, a decrease of 9.3dB in the average noise level (attributed to traffic associated with the premises) is projected. Consequently, it is concluded that the Proposed Development would not result in adverse changes in noise (or vibration) levels, in accordance with Policy RE8 of the adopted Local Plan.

Air Quality

- 5.30 An Air Quality Impact Assessment (AQIA) has been carried out by Anderson Acoustics to assess the impact of the proposals on the quality of air in the surrounding context.
- 5.31 The AQIA notes that the proposed change of use will result in a reduction in traffic flows and that the proposed change of use is would not result in an increase of more than 0.5% of the AQAI for NO2 and PM10 concentrations, resulting in a beneficial or at worst negligible effect.
- 5.32 The AQIA also notes that the effect of emissions from the Proposed Development is considered as "Not Significant" since it has no building emissions to consider as the site will be for open storage.
- 5.33 The demolition and trackout dust soiling and human-health effects are considered Low Risk and "Not Significant".
- 5.34 The AQIA concludes that the change of use is considered suitable for the Site and compliant with air quality policy and is considered to have a beneficial impact on air quality in the area when compared with the previous B2 use.

Ecology, Biodiversity, and Arboriculture

- 5.35 A Biodiversity Net Gain (BNG) Assessment alongside a Tree Survey and Arboricultural Method Statement (AMS) have been prepared by Arbtech in support of this planning application.
- 5.36 The AMS sets out the Proposed Development will require the removal of nine individual, category C trees. It also sets out a range of measures to be undertaken to protect the existing trees on site. This includes the use of 2.4m palisade fence posts, strategically positioned to avoid causing damage or necessitating the removal of critical tree roots essential for stability.

- 5.37 The BNG Assessment sets out that the Proposed Development will include a number of ecological enhancements, including woodland improvements, planting mixed scrub, and planting new trees, as set out in the Post Development Habitat Plan, located in Appendix 4 of the document.
- 5.38 Following the development, the habitat value is anticipated to increase to 5.11 units, with enhancements including 2.14 units of improved woodland, 0.36 units of upgraded grassland, 0.81 units of newly planted mixed scrub, 1.61 units of retained trees, and 0.19 units of newly planted trees.
- 5.39 The baseline habitat value of the site is 4.41 units, comprising 0.21 units of other neutral grassland, 0.26 units of introduced shrubs, 1.84 units of lowland mixed deciduous woodland and 2.10 units of rural trees.
- 5.40 This results in a net gain of 15.93% in habitat units. This exceeds the required 10% target of biodiversity net gain. The Proposed Development therefore complies with the requirements of the Environment Act, Core Strategy Policy SP18, Local Plan Saved Policy EMP9, and emerging Local Plan Policy NE3.

Transport, Access and Parking

Site Access

- 5.41 A detailed Transport Statement has been prepared by Calibro Consultants in support of this planning application and considers both local policy, including Policies M2 and M3, and national policy.
- 5.42 The report notes that access to the Site is achieved via Oxford Road which in turn is accessed from the B480-Watlington Road. Site traffic is required to pass through land managed by Unipart via security points from the access junction with Oxford Road. This route is shared by the Unipart occupants, and a one-way system operates around the Unipart building to control the flow of traffic to and from the Unipart and UYS sites.
- 5.43 The existing access into the Unipart land forms a priority T-junction with Oxford Road to the southwest of the Site. The junction operates as an access to an industrial estate and therefore it is deemed to be of suitable geometry and have sufficient visibility to accommodate the safe flow of vehicular traffic to and from the Site, as per previous long-established site operations.
- 5.44 Overall, it is considered that the area is industrial in its nature and characterised by a high flow of heavy goods vehicles. The few footpaths and cycle paths provided are primarily intended for internal use. As a result, it is considered that trips to the Site will be completed via vehicular modes only. This is explored further below.

Trip Generation and Parking

- 5.45 The Transport statement has compared the trip generation of a B2 facility at its peak, compared to the expected trip generation rates for a B8 facility on the same Site.
- 5.46 At its peak working capacity, the UYS building in its former B2 use could generate up to 1,673 two-way vehicle trips across a 12-hour day, which equates to 2 vehicles per minute, as set out in Table 5.1 below.

Time Period	Existing Trip Rates (Total People)			Existing Trips		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
AM Peak	0.619	0.295	0.91	77	37	114
PM Peak	0.726	1.008	1.73	91	126	217
Daily Total	6.960	6.423	13.4	870	803	1,673

Table 5.1: Existing B2 Trip Generation

- 5.47 In terms of existing Heavy Goods Vehicles (HGV's), the existing site is estimated to have generated up to 69 two-way vehicle trips across a 12-hour day.
- 5.48 The Transport Statement utilised the industry standard TRICS 7.10.4 database to estimate the trip generation potential of the Proposed Development as B8 land use. The results of the estimated trip generation data are set out in Table 5.2 below.

Time Period	Proposed Trip Rates (Total Vehicles)			Proposed Trips		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
AM Peak	1.3	0.9	2.2	8	6	14
PM Peak	0.7	1.6	2.5	4	9	13
Daily Total	16.8	16.7	33.5	101	100	201

Table 5.2: Proposed B8 Trip Generation

- 5.49 The table above indicates that the proposed change of use to a B8 facility could generate up to 201 two-way vehicle trips across the day. Similarly there is a reduced generation of HGV trips to a maximum of 8 trips a day.
- 5.50 This represents a significant decrease in peak hour traffic flows when compared to the existing use of the Site. Therefore, it can be assumed that the current access and parking arrangements for the Site are suitable in highway safety terms to accommodate the proposed change in use of the Site.
- 5.51 The traffic analysis assumes a typical daytime operation of a storage facility. However, it is possible that there may be a desire for future occupiers to operate overnight. In order to establish a typical 24-hour trip profile for the Site the last hour of the 12-hour trip profile has been used to project forward to develop a typical overnight profile. This would result in a maximum of 6 two-way trips. It is therefore considered that the traffic impact of an overnight operation would not be material.
- 5.52 Overall, the Proposed Development would result in a significant reduction in trips to and from the Site across both the AM and PM peak periods and the daily total trips, of 88%, 94% and 88% respectively. Therefore, it is evident that the proposed change of use would be of no detrimental impact to the existing access arrangements of the Site.
- 5.53 The Transport Statement therefore concludes that the existing access arrangements are deemed appropriate to accommodate the number of vehicular trips generated by the temporary change of use proposed.

6. The Planning Balance and Conclusions

- 6.1 This Planning Statement, and the suite of supporting application documents submitted in support of this application, demonstrates the case in support of the Proposed Development.
- 6.2 The NPPF establishes a presumption in favour of sustainable development and, in the light of the need to promote sustainable growth in rural areas to support local economies and communities, the NPPF indicates that applications for sustainable development should be allowed without delay. This is supported by Policy S1 of the adopted Local Plan, and Draft Policy S1 in the Council's emerging Local Plan.
- 6.3 The Proposed Development is supported at all levels of planning policy as suitable for industrial and storage uses. The Site is within an area acknowledged by the Council as a Category 1 Employment Area within the Local Plan and the Council has previously supported the re-use of the Site to provide a temporary B8 use.
- 6.4 Section 5 of this Planning Statement has demonstrated that the Proposed Development is in accordance with the relevant policies in the statutory development plan and will amount to sustainable development in accordance with the NPPF.
- 6.5 The Proposed Development would not have a detrimental effect on the character and appearance of the area, air quality, noise, highways safety, or on trees and ecology. It would be of direct benefit to the local economy in representing additional by providing much needed open storage, to meet a well-defined local demand. Both extant and emerging development plan policy along with the NPPF provide support for development which will form efficient use of underused land.
- 6.6 Furthermore, the Proposed Development will also improve the character and appearance of the Site and surrounding landscape through enhancements to existing planting, helping to achieve net gains in biodiversity in line with national and local planning policy and legislation.
- 6.7 It has been demonstrated in this Planning Statement that there are no material considerations which would indicate the Proposed Development should not be approved, and it is concluded that a decision to grant planning permission for the Proposed Development would be in accordance with the development plan when read as a whole.
- 6.8 In overall conclusion, we respectfully ask that planning permission for the Proposed Development is granted.

Appendix 1: Site Location Plan

