

**PLANNING, ACCESS & DESIGN
STATEMENT**

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Business
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1.0 INTRODUCTION AND PROPOSAL

- 1.1 This Statement concerns itself with a planning application for the change of use of a C4 House in Multiple Occupation [HMO] use into a Class C1 hotel at 222 London Road, Headington, Oxford.
- 1.2 The proposal does not involve any built additions to the property. Car parking exists within the site for 6no. spaces, along with a space for cycle parking and bin storage provision, with garden space at the rear for use by the hotel guests.
- 1.3 This Statement will refer to the application site context, the planning site history, the relevant planning policy framework and the proper planning considerations that flow from all of that, which act in support of the proposal.

2.0 THE APPLICATION SITE

- 2.1 The application site comprises of a detached, 2 storey property that stands on the corner of London Road and Ramsay Road in Headington.
- 2.2 It has forecourt car parking that takes its access from the return Ramsay Road, with a side cum rear garden area.
- 2.3 The London Road functions as a main public transport corridor and provides ready access by bus in and out of Oxford city centre, and on foot and bike too (a cycle path runs past outside the site and links to the city's extensive network of cycle routes) to all parts of the city. The local Headington District Shopping Centre stands a few 100m away to the west, with a full range of shops, services and employment opportunities, and the local hospitals in the area are closely nearby too. The site stands in a fully accessible part of Oxford.

3.0 RELEVANT PLANNING SITE HISTORY

- 3.1 Planning permission was granted for the current HMO use of the site in 2016 under the terms of planning application reference 15/03253/FUL.
- 3.2 Prior to that time, the property had been in guest house use since 2002. However, at or around 2014-2015 the guest house use at that time had proved to be unviable (a marketing campaign had been undertaken and the results, accepted by the Council then as demonstrating that the ongoing guest house use was no longer then viable) and the change of use to the current HMO use applied for and approved.
- 3.3 So the property has a previous and longstanding use as a C1 class use. The current application now seeks to revert that former use.

4.0 PLANNING POLICY FRAMEWORK

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

- 4.2 The Development Plan for the area comprises the Oxford Local Plan 2036 and I therefore draw upon the relevant policies of that Plan in the consideration of this Statement. I shall return to them below. First, a consideration of the relevant national planning policies follows.

Government Planning Guidance

- 4.3 Latest Government guidance as a material consideration relevant to the consideration of this application can be found in the National Planning Policy Framework (NPPF) December 2023.
- 4.4 At paragraph 1 the NPPF sets out the Government's planning policies for England and how they are expected to be applied.

Achieving Sustainable Development

- 4.5 The NPPF at paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 continues by stating that there are three overarching objectives to sustainable development: economic, social and environmental, and that these objectives are interdependent and need to be pursued in mutually supportive ways and give rise to the need for the planning system to perform a number of roles:
- a. **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;
 - b. **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; and
 - c. **an environmental objective** – to contribute 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.
- 4.6 In the first place then, it is submitted that the change of use of a site such as this, within the midst of the established built up area of Oxford, putting it into a commercial use and providing much needed short stay visitor accommodation in a tourist city like Oxford, must reasonably be considered to improve the economic, social and environmental wellbeing of the locality and Oxford on a wider basis. The proposal involved will bring more people into the area (compared to a HMO use) and generate greater economic cross-spending capacity, better sustaining local shops, services and other amenities, in particular within the nearby Headington District Centre, in the longer term in so doing. In a related vein, it performs a social role too, by generating new jobs for local people and increasing opportunities for employment. In environmental terms the site is in the right place inasmuch that it relates directly to the existing developed area of Oxford and makes a further efficient use of an existing brownfield site.
- 4.7 I consider the cross economic, social and environmental benefits are clear and obvious and the proposal is therefore rightly to be defined as a sustainable form of development.

- 4.8 Paragraph 10 of the NPPF follows and identifies that: “at the heart of the Framework is a presumption in favour of sustainable development”.

Presumption in Favour of Sustainable Development

- 4.9 Acknowledging then that at the heart of the NPPF is a presumption in favour of sustainable development, paragraph 11 of the NPPF echoes paragraph 10 and sets out that both plan-making and decision-taking should apply a presumption in favour of sustainable development.
- 4.10 It is submitted herein that the benefits that accrue from the proposal, i.e. the provision of some new, short stay visitor accommodation, into Oxford, where tourist demand for such accommodation is at such a premium, and where the economic benefits of introducing direct and spin-off spending opportunities are increased by doing so, in a fully accessible location, plainly represents a wholly positive and sustainable development opportunity overall for the local area that should properly be supported.

Decision-Making

- 4.11 Paragraph 38 of the NPPF states that local planning authorities should approach decisions on proposed development in a positive way and that decision-makers should seek to approve applications for sustainable development where possible. It has been demonstrated above that this proposal does represent a sustainable form of development and that therefore it should properly be positively supported.

Determining Applications

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

Building a Strong and Competitive Economy

- 4.13 Paragraph 85 of the NPPF states that planning policies and decisions should help create the constitutions in which businesses can invest, expand and adopt. Significant weight should be placed in the need to support economic growth and productivity. This is all most germane in a context where the proposal will bring employment creation into the city and in a sector, tourism, where Oxford is constantly in need of further such accommodation to meet the growing tourist need.

Promoting Sustainable Transport

- 4.14 Paragraph 108 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.
- 4.15 Supporting paragraph 109 then 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. The site stands fully within the developed area of Oxford, and in a locality where new development can readily be contemplated because of its sustainable, accessible location and the choices of all

non-car-borne modes of transport (bus, walking and cycling) that being located right on the main London Road route and its subsequent accessibility to the city centre and local areas affords.

- 4.16 The NPPF makes further clear at paragraph 115, that new development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. I cannot conceive of any such “severe” impact on highway related grounds, in going from the former C4 HMO use to the proposed C1 use, in such a fully accessible location as this.

Local Planning Policies

- 4.17 There are a number of locally based policies contained in the Oxford Local Plan (OLP) that are of relevance and between them act in support of the proposal too. I set all those I consider of relevance out below and offer commentary to.
- 4.18 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 and which reflects the presumption in favour of sustainable development contained in the NPPF. Planning applications that accord with the OLP will be approved without delay, unless material considerations indicate otherwise. In this case, it has already been set out above that the proposal is a defined form of sustainable development and the principle of it at least must be beyond any reasonable dispute. Also, that there are no known material considerations which stand against it. Accordingly, it is submitted that the Council should reasonably approve this planning application without any delay.
- 4.19 Policy HP6 of the OLP deals expressly with the provision of new HMOs. It is a permissive policy in its nature and it generally allows for the change of use of dwellings to HMOs. It does not however, in any part, seek the retention of HMOs nor oppose their loss.
- 4.20 Policy V5 of the OLP ‘Sustainable Tourism’ permits for new short stay visitor accommodation in certain locations only in Oxford, including upon Oxford’s main arterial roads where there is frequent and direct public transport to the city centre. London Road is expressly detailed in the terms of this policy as one of those main arterial routes. Straightforwardly then in these terms the proposal to provide a new Class C1 use at the property, on London Road, meets fully its stated requirements.
- 4.21 Policy M3 of the OLP deals with car parking provision in new developments. In this case, the proposed change of use does not seek to introduce any additional car parking and looks to make use of the existing 6no. car parking spaces to serve the 6no. guest rooms that would be created in the change of use. Given the eminently accessible nature of the site, this is considered to represent a more than reasonable availability of car parking for the proposed use in this location and that moreover, it is also reasonably assumed there is no concern in this matter and certainly no ‘severe’ harm impact to consider in any highway/transport terms as the NPPF sets the bar.
- 4.22 Policy M5 of the OLP covers the provision of on-site cycle parking. In this case more than ample space exists within the site for the provision of new cycle parking spaces (for example in a covered/racked form) and the applicant would be quite content to accede to any reasonable planning condition that sought the provision of such cycle parking spaces to be provided within the site.
- 4.23 Policy DH7 of the OLP requires that suitable provision for bin storage is made in any new planning application. In this case, bin storage already takes place in a compound area within the site and that provision would be maintained herein.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 The proposal has been shown herein to be in full accord with the relevant terms of the cited Development Plan policies and with national policy too.
- 5.2 The proposed change of use involves no external alterations to the existing building and, in effect, simply looks to reinstate the previous hotel use of the site.
- 5.3 Planning policy positively promotes the provision of short stay visitor accommodation on Oxford's main arterial routes, including London Road. The site of course stands on London Road.
- 5.4 The site itself stands in a fully accessible location where the users of the site would have the opportunity to make use of all modes of transport, including walking, that may be available.
- 5.5 Car parking exists on site too and would be unchanged.
- 5.6 Provision for cycle parking can be readily made within the site and refuse storage already takes place in an entirely conventional and satisfactory manner.
- 5.7 The application proposal represents a wholly sustainable form of development, the like of which both local and national policy positively permit for.
- 5.8 In view of all of the above, it is respectfully requested that planning permission as applied for, for the change of use of applied for, from HMO to hotel use, be granted.

