

Gateway Site, London Oxford Airport

Planning Statement (including Statement of Community Involvement, Public Benefits Statement and S106 Heads of Terms)

February 2023

Contents

| | | |
|-----|---|----|
| 1. | Introduction..... | 3 |
| 2. | Site & Surrounding Context..... | 6 |
| 3. | The Proposed Development | 10 |
| 4. | Statement of Community Involvement | 15 |
| 5. | Planning Policy Framework | 18 |
| 6. | Planning Assessment – Principle of Development and Land Use Matters | 20 |
| 7. | Planning Assessment – Green Belt Policy Matters | 22 |
| 8. | Planning Assessment – Other | 30 |
| 9. | Public Benefits Statement | 35 |
| 10. | Planning Obligations | 36 |
| 11. | Summary and Conclusions..... | 37 |

Appendices

Appendix I Planning History Schedule for the Application Site and wider Airport ownership

Appendix II Applicant Response to Pre-Application Advice received on 13/07/22

Report title: Planning Statement

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Status: Final

Draft date: February 2023

For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1 This Planning Statement has been prepared by Avison Young on behalf of Oxford Aviation Services Limited ('the Applicant') in support of a full planning application for the redevelopment of the Gateway Site at London Oxford Airport, Langford Lane, Kidlington ('the Site').

1.2 This Application seeks full planning permission for the following ('the Proposed Development'):

"Redevelopment of the site to include the demolition of existing buildings and development of new accommodation across 5 buildings for employment uses (use class E(g)(ii and iii)) plus ancillary amenity building, outdoor amenity space, car parking, cycle parking, landscaping and associated works."

Statement Structure

1.3 This Statement sets out the planning rationale that underpins the Proposed Development and demonstrates its acceptability in planning terms.

1.4 This Statement is structured as follows:

- **Section 2** provides an overview of the Site and surrounding context;
- **Section 3** sets out the Proposed Development;
- **Section 4** comprises the Statement of Community Involvement prepared for this application;
- **Section 5** sets out the planning policy framework relevant to the determination of the application;
- **Sections 6-8** assess the application against the relevant planning policy framework and guidance;
- **Section 9** summarises the public benefits of the scheme;
- **Section 10** sets out the draft Heads of Terms for planning obligations; and
- **Section 11** summarises the planning case for the Proposed Development.

Planning Application Package

1.5 The planning application package comprises the relevant forms, certificates and fee, alongside the plans and documents for approval and other supporting information, as explained below. The purpose of this documentation is to assist in the understanding and evaluation of the plans and details submitted for approval and to establish commitments to control implementation (where appropriate).

- 1.6 A comprehensive package of plans and documentation is submitted as part of this planning application. These have been agreed with CDC at pre-application stage and reflect national and local planning application validation requirements.
- 1.7 The following documents are submitted for approval:
 - **Site Location Plan:** Identifying the extent of the application site (within which development is proposed).
 - **Existing and Proposed Planning Drawings:** Setting out in full how the scheme will look, including details on matters of layout, scale and appearance of the buildings, landscaping and access arrangements.
- 1.8 In addition to the above, a full suite of supporting documents is submitted, a number of which make commitments and recommendations in order to make the proposed development acceptable, which we anticipate will be secured by means of condition where appropriate. The documents are as follows:

| Document Title | Prepared By |
|---|------------------------------|
| Application Forms, Certificates & Notices | Avison Young |
| CIL Form | Avison Young |
| Covering Letter | Avison Young |
| Planning Statement (including Statement of Community Involvement, Public Benefits Statement & S106 Head of Terms) | Avison Young |
| Design & Access Statement (including landscape plans/strategy & photographs/montages) | Spratley & Partners |
| Landscape Visual Impact Assessment | Colvin & Moggridge |
| Transport Assessment (including Travel Plan & Servicing and Delivery Strategy) | TPP Ltd |
| Phase 1 Ecological Survey (inc. BNG Report) | Delta Simons |
| Flood Risk Assessment | JBA Consulting |
| Surface Water Drainage/Management Strategy | Civils Contracting Ltd |
| Utilities Strategy | YES |
| Economic Needs Assessment and Benefits Statement | Lichfields |
| Energy and Sustainability Strategy (including BREEAM pre-assessment) | YES / Energist |
| Land Contamination Assessment (Baseline) | Fortitude Environmental |
| Tree Survey | Delta Simons |
| Archaeological Watching Brief WSI | John Moore Heritage Services |

| | |
|--|------------------------|
| Draft Construction Environmental Management Plan | Civils Contracting Ltd |
| Lighting Strategy | NVC Lighting |

2. Site & Surrounding Context

The Site

2.1 The Site is situated at the south-eastern corner of London Oxford Airport ('LOA'), immediately northwest of the junction between Langford Lane and The Boulevard which bound the Site to the east and south and connect the A44 (Woodstock Road) and A4260 (Banbury Road), north of Kidlington. It lies within the administrative area of Cherwell District Council ('CDC'), the Local Planning Authority (LPA). A Site Location Plan is included within the submission documents and extracted below in Figure 2.1.

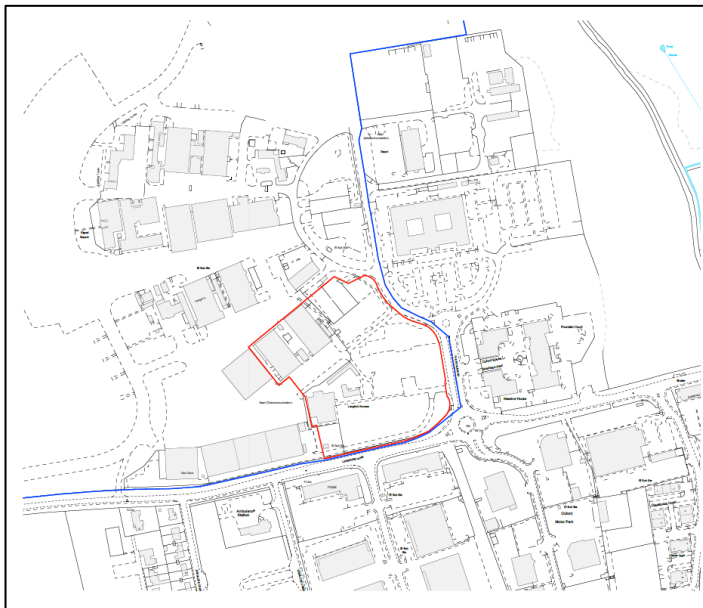


Figure 2.1: Site Location Plan

- 2.2 The site comprises previously developed land.
- 2.3 The Site falls entirely within the operational boundary of London Oxford Airport which currently comprises a single planning unit, with all uses being ancillary to the principal airport use (Sui Generis).
- 2.4 The Site extends to approximately 3.11ha and falls partly within the 'airside' part of the airport and partly within the 'land-side' part.
- 2.5 The airside part currently accommodates 2 vacant aircraft hangars which have come to the end of their functional lives, alongside associated hardstanding. The landside area accommodates a series of vacant/disused buildings most recently used for pilot training, alongside a former airport building temporarily being used as a gym and associated hardstanding (car parking) and landscaped areas.
- 2.6 The landside area was until recently occupied by two further buildings, which have recently been demolished. The larger of the two (Langford Hall) was demolished in July 2022, which provided

residential accommodation associated with the pilot training use for around 40 years, which is no longer needed. A large area of hardstanding and waste ground now dominates the eastern and southern portions of the site.

- 2.7 The floorspace of the existing buildings totals approx. 5,159m² GEA, contained within buildings that range in height from approximately 7m to 10m; noticeably lower than surrounding airport buildings outside of the application Site.
- 2.8 Existing landscape features comprise a managed hedgerow along Langford Lane and a number of pollarded trees (existing trees have historically been pollarded to deter nesting in proximity to aircraft).
- 2.9 Current access to the Site is primarily via The Boulevard from two access points, with further access to other areas of the Airport hangars and further parking areas to the north and west of the Site.

Surrounding Context

- 2.10 The Site is bound to the north and northwest by the built-up part of LOA which includes aircraft hangars, administrative buildings, taxiways, and other hardstanding. To the north and north east is a large office complex and associated surface car parking (occupied by Elsevier). It is bound to the east by The Boulevard, beyond which is a further large office complex and associated surface car parking (occupied by Thames Valley Police). It is bound to the south by Langford Lane beyond which is Oxford Technology Park which is under construction. Figure 2.2 below highlights this wider site context.

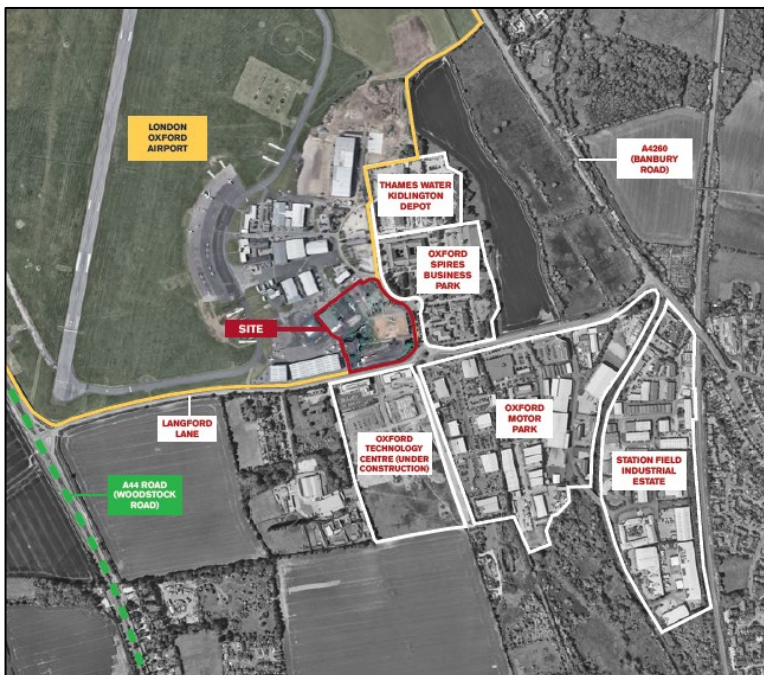


Figure 2.2: Site Context Plan (Marked-up Aerial Photograph)

Planning History

- 2.11 The Council's online planning register contains a comprehensive planning history for the site and the wider airport surroundings. This has been summarised in a detailed planning history schedule and included within Appendix I of this Planning Statement.
- 2.12 The operation of London Oxford Airport is controlled by the provisions of a Section 106 Agreement associated with planning permissions ref: 04/02743/F and 05/01324/F. The airport benefits from extensive permitted development rights for aviation related development, and its recent planning history is dominated by notifications and applications associated with undertaking development pursuant to these rights.
- 2.13 The application site's most recent relevant planning history includes the following::
- **Ref: 22/03749/SO** - Application for an EIA Screening Opinion associated with this planning application. **EIA not required.**
 - **Ref: 17/01983/PAO** - Prior Approval submission for the construction of new premises to accommodate a pilot training campus which will include student accommodation and a teaching block. **Not proceeded with.**
 - **Ref: 17/02190/F** - Full planning application for proposed pilot training school comprising 4-storey accommodation block, 2 storey teaching and training block, parking for cars, cycles and motorcycles, access road and landscaping. **Application withdrawn.**
 - **Ref: 17/00081/SO**- Application for an EIA Screening Opinion associated with 17/02190. **EIA not required.**
- 2.14 Furthermore, the planning history of land neighbouring the site to the south of Langford Lane (Oxford Technology Park) is also relevant, as set out below:
- The Original outline planning permission was granted on 10th October 2016 for a new Technology Park comprising 40,362 sq.m. of office, research and development, laboratory, storage and ancillary space (Ref: 14/02067/OUT).
 - The Original permission was subsequently varied under planning application ref. 17/00559/F to enable proper phasing.

- Reserved matters were approved on 24th November 2017 for units referred to as 1 and 3 (Ref: 17/01542/REM). These units are under construction and will provide approximately 11,952sqm of floorspace.
- An application was approved on 11th July 2018 for a hotel (Class C1) and ancillary restaurant (Class A3) including associated works, comprising the provision of parking spaces and landscaping (Ref: 17/02233/F) (operating as Premier Inn).
- An application was approved on 13th January 2023 for "*development within Use Classes E (g) (i), and/or (ii), and/or (iii), and/or B2 and/or B8 and Associated Works including Access and Parking*" (part retrospective) (Ref: 21/02278/F). This comprises 6,449sqm of floorspace spread across up to 11 units aimed at small to medium sized businesses.

3. The Proposed Development

3.1 The purpose of this section is to describe the Proposed Development for which planning permission is sought and to set out the specifications of the planning application.

Description of Development

3.2 Full planning permission is sought for:

“Redevelopment of the site to include the demolition of existing buildings and development of new accommodation across 5 buildings for employment uses (use class E(g)(ii and iii)) plus ancillary amenity building, outdoor amenity space, car parking, cycle parking, landscaping and associated works.”

3.3 The proposed development comprises the demolition of the existing buildings and redevelopment of the Site to provide approximately 18,767sqm GIA of new energy efficient, fit for purpose accommodation suitable for high value employment uses (use classes E(g) (ii and iii)).

3.4 The accommodation will be spread across 5 main buildings (ranging from 2,166sqm GIA to 5,238sqm GIA) which will be capable of being sub-divided into up to 17 units. In addition, a central amenity building (149sqm GIA) and covered cycle and service sheds are proposed alongside associated car parking and comprehensive landscaping works. Further details on the area breakdown of uses is shown in Table 3.1 below.

Table 3.1: Proposed Area Summary

| Use | GIA (sqm) |
|---------------------------------|---------------|
| Unit A – Office/Lab (Class E) | 2,874 |
| Unit B – Office/Lab (Class E) | 2,166 |
| Unit C – Office/Lab (Class E) | 5,238 |
| Unit D – Office/Lab (Class E) | 5,238 |
| Unit E – Office/Lab (Class E) | 3,103 |
| Total Office/Lab Area | 18,618 |
| Amenity Hub (Ancillary Class E) | 149 |
| Total Floorspace | 18,767 |

Layout and Massing of Proposed Buildings

3.5 The layout and massing of the proposed buildings are divided into three distinct building types which have been informed by the site context and are proposed across the site to create a range of building and floorplate sizes. This will allow the proposed scheme to offer flexible accommodation for a range of prospective occupiers within building forms that respond to and enhance the surrounding urban realm. These include:

- **Proposed Building Type 01** - Buildings A & B provide approx. 2,870m² and 2,170m² GIA respectively over two storeys and have been designed for subdivision of up to 7no. units. The buildings will be approx. 14.5m tall to the ridge and 10.5m to the eaves.
- **Proposed Building Type 02** - Buildings C & D each provide approx. 5,240m² GIA over two storeys. The buildings will be 14.5m tall to the ridge, and 10.5m to the valleys. Buildings C & D will be the largest buildings proposed in footprint terms and will feature distinctive cladding and portal frame structures. The gables have been positioned to echo the Hangar buildings adjacent and across the airport site, and the eaves of the proposal have lowered to reduce visual impact and massing from long-range views of the site.
- **Proposed Building Type 03** - Building E can provide up to approx. 3,100m² GIA of accommodation space over two storeys and can be subdivided into two units along the length of the building. The building will be approx. 11.5m tall to the ridge. Building Type 03 (Building E) is distinctive from the other units, featuring a flat roof and parapet set at a lower level than the eaves of the other accommodation buildings.

3.6 Figure 3.1 below offers an illustration of how the proposed buildings could be subdivided into approx. 17 units to ensure flexibility for prospective tenants, as indicated by the dashed lines. To maximise flexibility of letting sizes, five larger buildings have been proposed to allow for a range of demise sizes to suit single or multiple building letting scenarios across either single or double-storey accommodation.

3.7 Further details and precedent examples of each proposed building type are highlighted within the submitted Design and Access Statement.

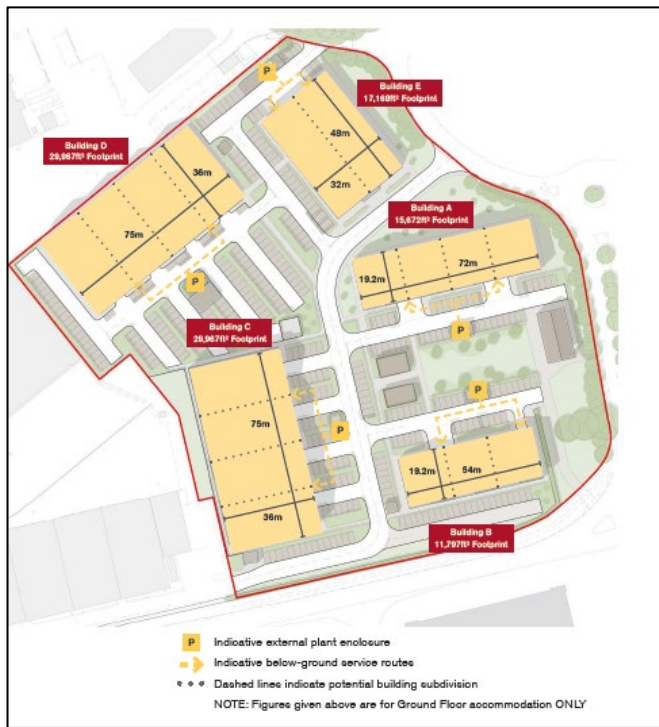


Figure 3.1: Floorplate Flexibility (extracted from DAS)

Access & Parking

- 3.8 The proposal seeks to rationalise access to the site and will focus all traffic movement on a single entrance and exit route in the centre of the development, accessed via the wider Oxford Airport entrance on The Boulevard. A secondary smaller access will be provided to the north to enable manoeuvring into the loading bays of Building E.
- 3.9 The proposed central access route reuses the position of an existing entrance, and widens the road junction and increases the bend radii to facilitate articulated lorry access to Hangar 14, which is only accessed through the application site. Secondary routes provide access to all vehicular parking areas and buildings. A new signage and wayfinding strategy will be implemented to improve navigation of the proposed development, create a distinct identity and provide a coherence to the proposed development.
- 3.10 As discussed further in the accompanying Transport Assessment and Section 7 of this Statement, it is proposed to provide a total of 322 car parking spaces and 195 cycling parking spaces.
- 3.11 The proposed level of car and cycle parking spaces has been agreed through pre-application discussions with CDC and OCC and is considered to strike a balance between ensuring the parking demand of the Proposed Development is met on site and will not result in overspill, and the need to promote sustainable transport.

Servicing

- 3.12 The road width, arrangement and buildings have been designed to accommodate refuse vehicles and rigid HGVs up to 10.6m in length. Each building will be provided with dedicated covered bin and cycle stores, which are easily accessible from the roads and have been located in proximity to all demises.
- 3.13 Further information on bin vehicle servicing and manoeuvring can be found in the Delivery and Servicing Management Plan provided by TPP Ltd.

Landscaping Strategy

- 3.14 The Site is focused around a central, spacious high-quality landscaped area and amenity hub, which offers a communal meeting point and encourages collaboration between building users and the wider LOA site.
- 3.15 The courtyard also allows for a clear landscaped link to be established through the Site which connects into a new pedestrian and cycle access from the Langford Lane and The Boulevard roundabout junction.
- 3.16 New native species specimen trees will be planted to the eastern boundary to replace those that have been pollarded, which also gives an opportunity to 'fill in' where there are gaps in the existing planting and strengthen the avenue feel along the main access to the airport site.
- 3.17 Airport constraints mean that existing mature trees on the site have been heavily pruned. Within the Site, the landscape approach is to accept removal of these existing specimens and to replace them with small new trees and extensive native hedging in lines and blocks. This will create a rich and varied soft landscape structure that will be more attractive and will support biodiversity without increasing the risk of bird strikes.
- 3.18 Furthermore, to improve visual and physical permeability of the development and facilitate non-vehicular access to the site, a permeable green boundary will be provided along the eastern boundary.

Phasing

- 3.19 The proposed development has considered the potential for phased delivery, aiming to deliver portions of the scheme that are self-supporting and include all parking required for each phase, as well as all other servicing and utility requirements. The proposed phasing is split as follows:

- **Phase 1 (5,240m² GIA of floorspace)** – Provision of the new central spine road to provide access to Hangar 14, construction of Building C and associated infrastructure and provision of central bin storage and cycle hubs and generator enclosure structures.
- **Phase 2 (5,040m² GIA of floorspace)** – Installation of central courtyard amenity space and café pavilion, construction of Buildings A & B and associated infrastructure and landscaping works including strengthening of trees along the Boulevard.
- **Phase 3 (8,340m² GIA of floorspace)** – Construction of Buildings D & E and associated infrastructure, landscape works to the north of the Site and provision of new pedestrian footpaths and links.

3.20 Further information on the proposed development phasing is outlined within the submitted Design and Access Statement.

4. Statement of Community Involvement

4.1 This Section of the Planning Statement comprises the Statement of Community Involvement for the proposed development. A summary of the engagement undertaken by the Applicant with key members of the local community is provided. This Statement also provides an overview of the design development process relating to the proposals and summarises the discussions held with Cherwell District Council and other statutory consultees through the formal pre-application process, demonstrating how the Applicant has worked collaboratively with Officers prior to the submission of this planning application.

Cherwell District Council Consultation

4.2 Three formal pre-application meetings have been held with the Council in November 2021, June 2022 and December 2022. These meetings covered a broad range of topics, including the principle of development, planning considerations relating to development in the Green Belt, layout and design, highways and access, flood risk and drainage, sustainable construction, trees, landscaping, ecology and biodiversity net gain, and heritage assets. A summary of the two most recent meetings are set out below:

Pre-Application Meeting 1 – 30th June 2022 (21/04195/PREAPP)

4.3 Following an on-site meeting on the 30th June 2022, CDC set out their pre-application advice in a formal letter dated 13 July 2022. The Applicant responded to the pre-application advice received in a note that accompanied other pre-application material at the second pre-application meeting. This response has been included in Appendix II.

Pre-Application Meeting 2 – 15th December 2022 (22/03441/PREAPP)

4.4 A final pre-application meeting was held with Officers on the 15th December 2022, with formal written advice issued on 4th January 2023. The pre-application feedback received on the proposals from CDC Officers can be summarised as follows:

- **Principle of Development** - Officers agreed that the principle of the development did not conflict with Green Belt local planning policy and that Kidlington Policy 1 provides significant policy support and a very compelling case for high value employment uses at the Site. Officers also confirmed that the Site is considered to be previously developed land in the Green Belt where NPPF planning policies are favourable to its proposed reuse, and therefore had no principle objection to the principle of development.

- **Design of the Development and Character of the Area** – Officers noted that in general the principles of the design and layout were supported with some refinement on elements including considering the entrances to Building B from the central courtyard (northern elevation).
- **Landscaping and Ecology** – Officers broadly supported the proposed landscaping proposals and requested that opportunities for entomological enhancement design would be explored both within the building design (green/brown roofs, living walls) and as freestanding features (e.g. feeding/nesting features). Officers also confirmed that opportunities for outdoor seating and bins should be explored with the potential to create usable outdoor space, particular for summer months and the need for shaded areas.
- **Transport and Highways** - Officers advised that new parking standards have been adopted by the County Council and the proposals need to be in accordance with these new maximum standards. EV charging facilities were also confirmed as a requirement of future planning applications. The project team was also required to provide a commentary on how the proposals meet the County's Decide and Provide Methodology and associated guidance. Cycle parking was also required to meet the minimum standard of 1 space for 100sqm. Walking routes were also suggested to be included within the Design and Access Statement.
- **Servicing** – Officers questioned the need for the southern turning head to Building B and suggested that a shorter access drive could be provided which would reduce the need for the turning head. Officers suggested that relocating bin stores to the central courtyard could be beneficial and servicing to the Café/Hub would also need to be considered.
- **Sustainable Construction and Mitigation** – Officers noted the importance of sustainable construction and stated that the proposals should seek to achieve a development in excess of Part L of the Building Regulations which is water efficient and in accordance with the Council's adopted planning policies on sustainability.
- **Flood Risk and Drainage** – Officers confirmed that the proposals would need to be aligned to national planning policy on the use of sustainable drainage systems wherever possible, as well as Oxfordshire County Council's surface water drainage guidance. A Flood Risk Assessment was also required to be submitted alongside the planning application.
- **S106 contributions** – Officers noted that S106 contributions would be required for local highways improvements, in line with County Council requirements.

- 4.5 Further information on how the proposals have addressed the feedback received from Officers is included within the submitted Design and Access Statement and is also set out within Sections 6-8 of this Planning Statement.

Public and Wider Stakeholder Consultation

- 4.6 The project team and the Applicant have engaged with the local community to ensure the local community and key stakeholders have had the opportunity to inform and shape the proposed development.
- 4.7 London Oxford Airport hosts a regular Airport Consultative Committee meeting on a quarterly basis with key stakeholders, members of the public and representatives from Cherwell District Council. The proposed development has been discussed with this committee as part of its preparation.

5. Planning Policy Framework

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. National planning policies, as set out in the National Planning Policy Framework (NPPF), are a material consideration.
- 5.2 The adopted Development Plan of relevance to the Site comprises the following:
- Cherwell Local Plan 2011-2031 (Part 1) (incorporating Policy Bicester 13 re-adopted December 2016) - July 2015
 - Cherwell Local Plan 2011-2031 (Part 1) Partial Review – Oxford’s Unmet Housing Need - September 2020
 - Saved policies of the adopted Cherwell Local Plan 1996 that have not been replaced (shown in Appendix 7 of the 2015 adopted Local Plan) - November 1996
- 5.3 The NPPF and the Local Plan are under review, however these are both at an early stage in their preparation. Draft documents should be afforded limited weight in decision making at this point in time.
- 5.4 CDC has prepared a number of Supplementary Planning Documents to provide additional guidance on the implementation of Local Plan policies. This includes the Kidlington Framework Masterplan (2016), which provides guidance specific to Kidlington, referencing Policy Kidlington 1 which seeks to deliver high value employment needs in/around Langford Lane/Oxford Airport, including small scale Green Belt releases.
- 5.5 The Airports National Policy Statement (2018) is relevant to the London Oxford Airport site and in considering some development proposals.

Site/Area Specific Policies

- 5.6 The site is not allocated for development in the Local Plan, however it falls within the area covered by Policy Kidlington 1, an area-specific policy that aims to accommodate high value employment needs at locations in/around Kidlington, including Langford Lane/Oxford Technology Park/ London Oxford Airport.

Policy Designations

- 5.7 The entire site is designated as Green Belt, where Local Plan Policy ESD14 and saved Policy GB3 apply.

- 5.8 We note that there are no Listed Buildings on the site nor is it located within a Conservation Area or within the setting of any Listed Buildings. Blenheim World Heritage Site is approximately 3km to the west. The site is designated as being within Flood Zone 1 (low risk of flooding) on the Environment Agency Flood Risk Maps.
- 5.9 There are no Tree Preservation Orders affecting the site.

6. Planning Assessment – Principle of Development and Land Use Matters

- 6.1 The following sections assess the Proposed Development against the key planning considerations.
- 6.2 This section focuses on the principle of the development, including the demolition of the existing buildings and land use matters.

Previously Developed Land

- 6.3 The site comprises previously developed under-utilised land in an accessible location served by public transport. NPPF para's 119-120 (draft NPPF para's 121-122) are clear that planning policies should seek to make as best use as possible of such sites to meet assessed needs, in order to ensure the effective use of land while safeguarding and improving the environment.

Demolition of Existing Buildings

- 6.4 As set out in the accompanying Landscape Visual Impact Assessment, the existing buildings are of no/limited architectural merit. Furthermore, the existing buildings on the Site are not statutorily or locally listed and are not located within a Conservation Area and their demolition offers the opportunity to bring forward much higher quality design.
- 6.5 Recognising that the buildings have embodied carbon, consideration has been given to their potential for reuse/conversion. It has been concluded that the buildings do not lend themselves to conversion for the required use (high value employment uses – as stipulated by Local Plan Policy Kidlington 1), and that their replacement with energy efficient buildings would be a more sustainable approach overall.
- 6.6 As such, there is no policy protection for the existing buildings and their removal and replacement is acceptable in principle, subject to wider site and policy considerations, in particular the impact of the replacement development on the Green Belt (considered in detail in the following Sections).

Land Uses

Loss of Existing Use

- 6.7 The Site falls entirely within the operational boundary of London Oxford Airport and forms part of the airport planning unit. The airport estate accommodates a number of non-aviation uses which in practice are ancillary to the principal airport use (Sui Generis). The proposed development involves

the change of use of the land to a non-aviation use. There are no policies in the Airports National Policy Statement, NPPF or Local Plan that specifically protects the existing use.

The Proposed Use

- 6.8 The proposed development involves the change of the use of the land to high value employment uses (Use class E(g) (ii and iii)), which is specifically supported by Local Plan Policy Kidlington 1. 'High Value Employment' is not defined in the Local Plan however the supporting text to Policy Kidlington 1 makes reference to 'high technology industries' and the 'research and development sector'. As explained in the accompanying Design and Access Statement, the proposed development has been designed to target the higher value uses/occupiers that the policy seeks to provide for.
- 6.9 The proposed employment uses also include the provision of a central ancillary amenity building which would include a café and co-working space to provide for the day to day needs of the employees on the Site. Whilst strictly speaking this would comprise a town centre use, this is a location-specific need which requires on-site provision, rather than within the town centre (which satisfies any sequential policy matters).
- 6.10 It is noted that the applicant is also the operator of LOA, who have confirmed that the proposed development is acceptable from an airport safety and operational perspective.

Summary

- 6.11 In summary, the proposed development delivers the requirements of Policy Kidlington 1, via the redevelopment of this accessible under-utilised previously developed site to provide new accommodation to meet the district's high value employment needs.

7. Planning Assessment – Green Belt Policy Matters

- 7.1 The entirety of the Site is designated as Green Belt (GB).
- 7.2 Local Plan Policies Kidlington 1 and ESD14 confirm that Exceptional Circumstances exist to justify the removal of the site's Green Belt designation, however the actual review is deferred to a subsequent local plan document. While this is an important material consideration, the proposed development must be judged on the basis of its current Green Belt designation.
- 7.3 Local Plan Policy ESD14 and saved Local Plan Policy GB3 are the principal relevant local plan policies relevant to Green Belt matters. Local Plan Policy GB3 is not entirely consistent with the NPPF and Local Plan Policy ESD14 defers to the NPPF for the purposes of assessing development proposals. Accordingly, in our view the NPPF provides the principal Green Belt policy basis for determining the acceptability of the proposal.
- 7.4 In summary, the planning application seeks approval for the redevelopment of a previously developed site in the Green Belt, which has been designed to not have a greater impact on the openness of the Green Belt than the existing development. This satisfies the exception at NPPF para 149(g) (draft NPPF para 151(g)) and therefore should not be treated as inappropriate development.
- 7.5 Should the Council reach the view that the proposed development would have a greater impact on openness than the existing development (and therefore would be inappropriate), there are clear very special circumstances that would outweigh any harm to the Green Belt to justify this in line with NPPF para. 148 (draft NPPF para. 150).
- 7.6 We explain this case below, covering the following main policy matters:
- (i) The contribution the Site currently makes to the fundamental aim and purposes of GB;
 - (ii) The extent of the site that comprises previously developed land;
 - (iii) Assessment of the impact the proposed development will have on openness;
 - (iv) Judging overall impact on openness and substantiating any harm; and
 - (v) What could constitute VSC.

(i) Contribution to the Fundamental Aim and Purposes of GB (Existing)

Site Characteristics

- 7.7 The site does not accord with the essential characteristic of Green Belt: openness.

- 7.8 The site forms part of a contiguous urbanised area that includes the settlement of Kidlington. It is encircled by built development/urban form, which takes the form of an intensely developed mix of mainly aviation and commercial buildings and associated surface infrastructure. The closest area of genuinely open land is in excess of 100m to the east or west from the site boundary.
- 7.9 It follows that its contribution to the fundamental aim and purposes of GB must therefore be limited, an assertion that is confirmed in the Council's Green Belt Study.

Green Belt Study

- 7.10 The Site is located within areas which have been previously assessed in Green Belt evidence studies: **Parcel A1** in the PR42 Small Scale Green Belt Review 2016 and **Parcel PR118a** in the PR40 Cherwell Green Belt Study and Addendum 2017 which consider their potential for release from the Green Belt.
- 7.11 The Council's evidence base document 'PR42 Small Scale Green Belt Review, Accommodating High Value Employment Needs at Kidlington/Begbroke' (2016) assesses the contribution that the built-up part of the airport as a whole makes to the 5 purposes of Green Belt. Referred to as 'Parcel A1', it concludes that the land *"does not play any significant role in contributing to Green Belt Purposes 1, 2 and 4"* (Page 82).
- 7.12 The Site comprises a small part of this parcel. Noting that the Site contains existing buildings and fixed surface infrastructure and that it is encircled by buildings on neighbouring sites, it is reasonable to conclude that the Site also makes no contribution to Green Belt Purpose 3. Furthermore, noting that the district has exhausted its supply of derelict and other urban land that is suitable for recycling (hence the need to allocate greenfield land) it is also reasonable to conclude that the Site does not make a significant contribution to Green Belt Purpose 5.
- 7.13 The Council's PR40 Cherwell Green Belt Study and Addendum 2017 concludes on the harm to Green Belt resulting from release of the area within London Oxford Airport occupied by buildings; that ***"the parcel's only role in contributing to Green Belt purposes relates to the prevention of countryside encroachment: distinction between the Business Park and functional airfield-related development is significant in preserving some contribution to safeguarding the countryside, but the extent of development in the parcel limits the strength of this role."*** Noting that this comment relates to the parcel as a whole, and that development has already 'encroached' over the site and beyond (and therefore it does not constitute countryside), we do not see how the applications itself plays any role in preventing countryside encroachment.

7.14 On this basis, we conclude the Council's evidence aligns with our view that the site does not currently make a significant contribution to any of the 5 purposes of the Green Belt.

(ii) Previously Developed Land

7.15 Previously Developed Land (PDL) is defined at NPPF Annex 2:

"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape".

7.16 The entirety of the Site comprises PDL (for the purposes of the NPPF definition), in that it is land which is and has been occupied by permanent structures and associated fixed infrastructure.

(iii) Assessing Impact on Openness

7.17 Openness is an essential characteristic of Green Belt – it is this characteristic that achieves the fundamental aim of Green Belt (to prevent urban sprawl) and the five purposes of Green Belt defined in Paragraph 138 of the NPPF (Draft NPPF para. 140). If the extent of openness materially changes (as a consequence of development) this will likely change the contribution that a site makes to the fundamental aim and purposes of Green Belt.

7.18 Extensive case law exists on how practitioners and decision makers should assess impacts on openness, which is reflected in the PPG. The PPG (Paragraph: 001 Reference ID: 64-001-20190722) states that *"assessing the impact of a proposal on the openness of the Green Belt requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:*

- *Openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *The duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *The degree of activity likely to be generated, such as traffic generation".*

Case Law

7.19 Notable case law includes the following:

- Turner v SSLG (2016) - The concept of openness is not narrowly limited to volumetrics. The word 'openness' is open textured and a number of factors are capable of being relevant when it comes to the particular facts of a specific case. Prominent among these factors will be how built up the GB is now and how built up it will be when development occurs (in the context of which, volumetric matters may be a material concern but are by no means the only one) and factors relevant to the visual impact on the aspect of openness which the GB presents.
- Samuel Smith Old Brewery (Tadcaster) and others v North Yorkshire County Council (2020) - The concept of "openness" is a broad policy concept. It is naturally read as referring back to the underlying aim of Green Belt policy, stated at the beginning of this section: *"to prevent urban sprawl by keeping land permanently open ..."*. Openness is the counterpart of urban sprawl and is also linked to the purposes to be served by the Green Belt. As PPG2 made clear, it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept. *"[Openness] is a matter not of legal principle but of planning judgement for the planning authority or the inspector"*.

Appeal Decisions (Surface Car Parking)

7.20 The Site currently accommodates extensive surface car parking. There are a number of appeal decisions that consider the impact that surface car parks have on openness, including:

- **Appeal ref. APP/R1038/W/20/3245986 (Renishaw Hall, Sheffield)**

Cumulatively, the provision of a surface car park together with the parking of cars would have a moderate visual and spatial impact on the openness of the Green Belt. The degree to which the car park would be used (i.e. number of cars and number of hours per day) was a relevant consideration in assessing the magnitude of impact.

- **Appeal ref. APP/R1845/W/20/3263504 (Land adjacent to A448, Kidderminster)**

Concluded that while the parking of cars on the site would be intermittent, it was likely that the car parking spaces would be well used and therefore for long periods of time such car parking would not preserve the openness of the GB. Furthermore, and given the amount of land needed for car parking, it was considered that this would lead to encroachment into the countryside.

Assessment

7.21 In practice, the measurement of openness is not an exact formulaic quantifiable science, but rather a subjective matter to be assessed by the decision maker. Professional judgement is required to reach a determination on whether a proposed development will have a greater impact on openness, and how substantive that impact would be. This should be based on fact and degree, with robust evidence being necessary to reach robust informed judgements.

7.22 As per the PPG and the Turner judgement, consideration should be given to both spatial and visual factors in considering impact on openness. The degree of activity and duration of the development are also relevant. These are considered in turn below:

Spatial Impact

7.23 In accordance with the Turner judgement, the key spatial consideration is how ‘built-up’ the site is. In this context, building footprint, floorspace and volume and area of hardstanding are commonly used metrics. It is for the decision maker to reach a judgement on which metric(s) are most relevant, and the amount of weight to be afforded to each, on a case by case basis. We provide a comparison between the existing and proposed development in Table 6.1 below:

Table 6.1 Spatial Metrics

| Metric | Existing | Proposed |
|----------------------------|----------|-----------|
| Building Footprint | 4,836sqm | 10,334sqm |
| Building Floorspace | 5,159sqm | 18,767sqm |

7.24 As is clear from the table above, the amount of development proposed is greater than the existing however this does not necessarily mean that it will have a greater impact on the openness of the Green Belt. This should be considered in conjunction with visual impact in order to reach a balanced judgement.

Visual Impact

7.25 The aforementioned 2016 Green Belt study notes that the “*extent of existing development limits the additional impact that further built development would have*” (page 48). The proposed development has been designed to ensure that it will not have a harmful visual impact on the Green Belt, and we note the following:

- The site is encircled by existing buildings which will screen views of the proposed buildings either in part or full depending on the viewpoint.

- The siting of the proposed buildings does not block any notable views through the site and the wider Green Belt.
- The height of the proposed buildings is similar to the existing surrounding context and therefore is not anticipated to breach the background skyline of existing built form when viewed from outside of the site.

7.26 There are two components to visual impact: (1) visual openness within the site itself; and (2) the visibility of the proposed buildings and fixed infrastructure from land designated as GB outside of the site.

7.27 Professional judgement is required as to how much weight should be given to changes in the visual impact of Proposed Development when viewed from within the Site itself and from outside, having regard to the magnitude of the change and the significance this change would have on the contribution that the land makes to the fundamental aim and purposes of GB.

7.28 To assist in this regard, the Landscape Visual Impact Assessment (LVIA), prepared by Colvin & Moggridge, has been prepared and accompanies this planning application. In summary:

- The development site makes no appreciable contribution towards openness at present. The area is separated from the open Green Belt on all sides by existing enclosure and has a derelict, brownfield character. Both inward and outward views are terminated by built form.
- The replacement buildings would represent an increase in the density of built form on site, but this would have no effect on the visual openness of the Green Belt. Some mid-range views would be maintained and improved, and others would be lost, but there are no views towards the open Green Belt at present and none would be created.
- Overall, the redevelopment proposals would have no greater visual impact on openness in comparison to the existing development and are therefore considered to be fully compatible with preserving the openness of the Green Belt.

(v) Judging Overall Impact on Openness and Substantiating any Harm

7.29 A judgement needs to be reached as to whether, on balance, the proposal will result in a 'greater' impact overall or not. Where it is judged that the impact will be a greater impact on openness than the existing then a judgement then needs to be made on how substantive the harm is associated with this.

- 7.30 Openness and the effect this has on GB purposes are inextricably linked, with the matter of 'openness' being the characteristic or mechanism by which the five objectives and fundamental aim of GB (preventing sprawl) are achieved. It follows that key to substantiating any harm is considering the degree to which any changes to openness will impact on the contribution that the site makes to GB purposes. The greater the impact on this, the more substantial the level of harm would be. Equally, where there would be little/no impact on a site's contribution to GB purposes it would be reasonable to conclude that harm would not be substantial.
- 7.31 The assessment set out above confirms that the amount of development proposed on the site is greater than the existing. However, the LVIA confirms that the proposed design ensures that this can be delivered on the site with a neutral effect in visual impact terms which will resolve/mitigate any potential harm that could have arisen from the spatial impact of the development. Our judgement is that the proposal will not have a greater impact on the openness of the Green Belt than the existing. On this basis it would satisfy the exception at NPPF para 149(g) (Draft para 151(g) (first arm)).
- 7.32 This view is also supported by pre-application feedback from the Council received in July 2022 which notes that given the containment by existing development and the findings of the Cherwell Green Belt studies on the contribution of Parcels 1A and PR118a, it is considered that it is unlikely that there would be an unacceptable impact on the openness of the Green Belt by this proposal, subject to consideration of its design and massing.

(v) What Could Constitute Very Special Circumstances (VSC)

- 7.33 The assessment in this Section demonstrates that the Proposed Development is not 'inappropriate' (i.e. development would not have a greater impact on the openness of the Green Belt than the existing development and would satisfy the first arm of NPPF para 149(g)) (Draft NPPF para. 151(g)). However, it is recognised that if a different conclusion was reached that the Proposed Development would lead to harm to the GB, its acceptability will be dependent on demonstrating VSC.
- 7.34 In considering whether VSC exist, the fact that the Council has concluded that Exceptional Circumstances (EC) exist to justify the removal of the site from the Green Belt (to allow for high value employment use development) is a relevant material consideration. While this is a different policy test, there is commonality in the components that underpin both an EC and VSC case. In this instance there are significant economic (and therefore public) benefits associated with allowing high value employment use development on the site (as proposed) which would outweigh any harm to the fundamental aim of Green Belt policy and the purposes of including land within the Green Belt which, for the reasons discussed above, are limited.

- 7.35 VSC are based upon the benefits of allowing the scheme to proceed, which are required to clearly outweigh the harm. Firstly, this requires a judgement to be made on the substantiveness of any harm and secondly a judgement on the substantiveness of scheme benefits, which must be weighed up against one another. Again, this requires professional judgement – it is not a formulaic matter.
- 7.36 It is considered that VSC could be applied to the Proposed Development given the significant public benefits which result from the scheme. These are outlined in detail in Section 9.
- 7.37 We note that this would be consistent with the accepted planning case for application ref. 14/02067/OUT (Oxford Technology Park) where it was concluded that the development constituted inappropriate development in the Green Belt but that Very Special Circumstances existed to justify it (the need for high value employment land, as established by Policy Kidlington 1).

Summary

- 7.38 The site comprises previously developed land within the Green Belt.
- 7.39 It does not accord with the essential characteristic of the Green Belt: openness. As a consequence, its current contribution to the fundamental aim and purposes of Green Belt is limited, as confirmed in the Council's Green Belt Study.
- 7.40 On the basis of the evidence submitted with this application, our judgement is that the proposed development will not have a greater impact on the openness of the Green Belt than the existing development. Accordingly, the proposed development satisfies the exception at NPPF para 149(g) (Draft NPPF para. 151(g)) (first arm) and therefore is not inappropriate development, and therefore acceptable in Green Belt policy terms. This view is consistent with pre-application CDC Officer advice received in December 2022.
- 7.41 Notwithstanding this, if the Council were to conclude that the proposed development did have a greater impact on the openness of the Green Belt, there is also a compelling Very Special Circumstances case to justify it (in accordance with NPPF para's 147-148, draft para's 149-150).

8. Planning Assessment – Other

8.1 This section assesses the Proposed Development against the remaining key planning considerations, namely:

- Design;
- Landscaping and Trees; and
- Environmental and Technical Considerations (including Transport; Biodiversity and Ecology; Energy and Sustainability; Flood & Drainage; Archaeology; and Ground Investigations).

Design

8.2 The importance of high quality design is made in clear in NPPF paragraphs 126 and 134 (draft NPPF para's 128 and 136), as reflected in Local Plan Policy ESD15 and saved Policy C28. Of particular relevance to this application are the area specific design principles set out in Local Plan Policy Kidlington 1 (and the Kidlington Framework Masterplan SPD) which have been key drivers underpinning the proposed design. These have been blended with Green Belt openness considerations to ensure that the design of the proposed development is the most appropriate having regard to all relevant policy considerations.

8.3 Considerable work has been undertaken to understand the character and appearance of the surrounding context and to create a design which enhances the Site's relationship with its locality.

8.4 The proposal has been sensitively designed to provide an appropriate level of development for the site which will significantly improve the quality of space and streetscape by building on the distinctive character of the wider airport site, and the site arrangement and landscaped courtyard space will create the high-quality 'gateway' development that is highlighted within local planning policy including the design criteria of Policy Kidlington 1.

8.5 The proposed development has been subject to extensive pre-application discussions with the Council regarding details of its design and has been refined to address comments received and provide a successful redevelopment of this under-utilised site. Further details of the design development and the pre-application feedback is outlined in the submitted Design and Access Statement.

Landscaping & Trees

8.6 Local Plan Policies ESD10/13/17 and Kidlington 1 (and the Kidlington Framework Masterplan) have been the main policy drivers that have informed the landscape scheme.

- 8.7 Introducing new landscaping and providing access to outdoor amenity/open space has been central to the proposed design. The proposals involve the installation of a central, landscaped courtyard which offers a communal meeting point and encourages collaboration between building users and brings significant benefits by creating a space that can be used by employees both within the development, the wider LOA site and from surrounding businesses.
- 8.8 The proposed courtyard will also allow for a clear landscaped link to be established through the site which connects into a new pedestrian and cycle access from the Langford Lane / Blvd. roundabout junction. In general, the proposed landscape design will enhance the existing layout which currently comprises cleared waste ground and will create a series of new high-quality landscaped spaces, routes and views through the site.
- 8.9 The distinctive mature tree-lined character of The Boulevard has been considered as key to both the quality and amenity of the airport, arrival experience and the wider landscape. As such, the proposals involve the replacement of 15no. heavily pollarded and unattractive trees on the north east boundary with 16no. alternative broadleaf species which will assist in reinstating the avenue character along The Boulevard where this has been lost.
- 8.10 The green infrastructure approach to the site includes the retention of a majority of the existing trees and the provision of new tree planting throughout the site and enhancing the net gain through biodiversity enhancements. The proposed tree planting will strengthen the green infrastructure network and meadow planting, as well as amenity and active lawn areas, will further enhance the Site's biodiversity to assist in retaining the green character of the Green Belt. Further details are outlined within Delta Simons Arboricultural Survey report.
- 8.11 Refer to the Design and Access Statement and Landscape Masterplan for further details.
- 8.12 As such, it is considered that the proposed landscaping proposals successfully align with the local planning policy objectives as highlighted in Policies ESD13, ESD17, Policy Kidlington 1 and the Kidlington Framework Masterplan.

Environmental and Technical Considerations

Transport

- 8.13 Saved Local Plan Policies TR2/3/5/10, and Local Plan Policies SLE1/4, Kidlington 1 and the Kidlington Masterplan have been the key policies that have underpinned the transport, access, circulation, servicing, and cycle/car parking components of the scheme.

- 8.14 The site has good accessibility to a large population catchment within walking and cycling distance from the site and links to public transport, such as the 7 Gold bus route which can be accessed from The Boulevard, and Oxford Parkway Rail Station which provide genuine sustainable transport alternatives. The development will provide car parking below maximum standards and cycle parking in-line with minimum standards and will prioritise and support access by walking and cycling within the schemes design. The proposals also provide appropriate servicing access for multiple tenants and all bin stores are located next to road routes, in order for easy reach for bin collection vehicles and utilisation of loading bays and turning heads. This is discussed in further details in the accompanying Delivery and Servicing Plan prepared by TPP.
- 8.15 This application is supported by a Transport Assessment which concludes that the design of the development accommodates sustainable travel behaviours and is accessible by public transport. The development proposals are therefore considered to fully comply with the respective local, regional and national transport policies, including OCC's new 'decide and provide' guidance and will have a negligible impact on the surrounding transport infrastructure. Further details are outlined within the Transport Assessment and Travel Plan which accompany this planning application.

Biodiversity and Ecology

- 8.16 The key Local Plan policies comprise ESD10/11 and Kidlington 1, alongside saved Policies C1/2.
- 8.17 An Ecological Impact Assessment (EclA) is submitted alongside this application, prepared by Delta Simons, which addresses the potential effects of the proposed development on ecology and nature conservation. It is noted that due to the development's type, small scale and distance from designated sites, there are no adverse impacts on designated sites anticipated as a result of the proposals. The report highlights that appropriate mitigation is required during site clearance in relation to the potential for roosting bats and nesting birds, and a sensitive lighting plan is required to avoid increased light levels post-development.
- 8.18 The habitat on Site were surveyed and assessed for their suitability to support protected/otherwise notable species by Delta-Simons on 22nd September 2022 and a further Bat Roost Potential (BRP) survey undertaken on the 13th December 2022.
- 8.19 A Biodiversity Net Gain Assessment and associated Biodiversity Metric is submitted alongside this application. This assessment includes calculations for the Site which indicate that a gain in biodiversity of 19.67 % can be achieved for area units and a gain of 244.41% for linear units. An appropriate landscape management and monitoring plan will be prepared to promote the long-term biodiversity value of the retained and proposed habitats.

- 8.20 As such, the report concludes that in the long term it is anticipated that there will be no significant residual effects on habitats or protected species resulting from the proposed development. The proposals therefore comply with policy on all levels and are acceptable with regards to biodiversity and ecology.

Energy and Sustainability

- 8.21 Local Plan Policies ESD1-5 and Kidlington 1 have underpinned the proposed energy and sustainability strategy.
- 8.22 Full details of how the proposed development seeks to meet the Council's relevant policies are outlined within the accompanying Energy and Sustainability Statement prepared by YES / Energist. This includes the review of renewable energy opportunities for the proposals including the provision of PV panels and achieving a BREEAM 'Very Good' score.

Flood & Drainage

- 8.23 A Flood Risk Assessment, prepared by JBA Consulting, and Surface Water Drainage/Management Strategy, prepared by Civils Contracting Ltd, accompany the application which have been prepared in line with the requirements of Local Plan Policies ESD6-8 and Kidlington 1.
- 8.24 As set out in the Flood Risk Assessment, the Proposed Development will not be unduly at risk from flooding. The Site is located within Flood Zone 1 and is assessed to be at low risk of flooding from all sources. The Assessment provides a few recommendations for the proposals which includes setting the finished Floor Levels (FFL) and openings (e.g. air bricks) of the proposed buildings a minimum of 150mm above the finished surrounding ground levels. It is also suggested that the surface water runoff originating within the redeveloped site is managed using SuDS techniques and the finished floor levels of the buildings should be designed with care regarding the appropriate requirements for exceedance flows and appropriate allowances for freeboard.
- 8.25 It is therefore considered that flood risk both on and off-site will be reduced as a result of the development.

Archaeology

- 8.26 A Written Scheme Of Investigation has been prepared by John Moore Heritage Services and accompanies this planning application, in line with the requirements of Local Plan Policy ESD15. The Written Scheme of Investigation outlines the procedures to be taken during the ground works of the

development proposals. It is also noted that an archaeological watching brief was maintained during the excavation geotechnical pits in 2022 and no archaeological features or finds were observed.

8.27 As such, the proposed development will comply with adopted local planning policies on archaeological.

Ground Investigations

8.28 A Land Contamination Assessment (Baseline) Assessment, prepared by Fortitude Environmental, has been submitted in support of the Application as per saved Local Plan Policy ENV12. The assessment establishes the baseline condition of the site and highlights the results of analysis which show concentrations of relevant determinants to be below commercial use criteria using the LQM S4UL values where available.

8.29 As such, it is expected that suitably worded planning conditions will be utilised to ensure that investigations occur, prior to the commencement of ground works on the Site.

8.30 Given the above, we consider that contamination and geotechnical considerations associated with the proposals can be successfully and robustly addressed, and that the proposed scheme therefore accords with relevant policy objectives.

9. Public Benefits Statement

9.1 As demonstrated within this Statement, the overarching benefit of the Proposed Development is that it delivers 'Sustainable Development' via the delivery of the objectives of national planning policy and the current Local Plan and associated guidance. More specifically, it delivers the requirement of Local Plan Policy Kidlington 1 to provide new high value employment accommodation to meet the district's assessed needs.

9.2 The application is supported by an Economic Needs Assessment and Benefits Statement prepared by Lichfields, however a summary of the key economic benefits are set out below:

Construction:

- An investment in the region of £30-35 million, supporting 194-227 FTE jobs directly in addition to a further 293-342 FTE jobs more widely over a presumed two-year construction period.
- A direct economic (i.e. GVA) contribution of £15.9-£18.6 million, in addition to a further £19.1-£22.3 million more widely (i.e. through supply chain and induced effects).

Operational:

- Support between 206-309 net additional high-skilled / high-value FTE jobs directly on-site, in addition to a further 225-338 FTE jobs more widely (i.e. through supply chain and induced effects).
- Generate an overall annual contribution of £38.4-£57.6 million to the economy (i.e. based on direct, supply chain and wider induced effects) in perpetuity.
- Once occupied, the employment floorspace has potential to generate in the region of £1.90 million in additional business rates revenue for Cherwell District Council, which has potential to help fund the Council's day-to-day operations, whilst also enabling investment in important local and wider infrastructure and services.

9.3 Further details on the need for the proposed development and its economic contribution are outlined within the Economic Needs Assessment and Benefits Statement.

10. Planning Obligations

Draft Heads of Terms

- 10.1 Adopted Policy INF1 notes that development proposals are required to demonstrate that infrastructure requirements can be met including the provision of transport, education, health, social and community facilities.
- 10.2 The Applicant intends to enter into a legal agreement with the Local Planning Authority (LPA) under Section 106 of the Town and Country Planning Act 1990 to secure the required planning obligations. The purpose of this section is to set out the terms of the proposed obligations which follow preapplication discussions with Officers.
- 10.3 Reflecting the guidance set out in the Council's Developer Obligations SPD (2018) the Applicant has been working with CDC regarding the Draft S106 Heads of Terms. These are expected to include the following:
- Employment, Skills and Training Plan (ESTP) to ensure the scheme contributes to CDC objectives for local training and employment, including construction apprenticeships (for non-residential uses, 3 apprenticeships per 1,000sqm floorspace); and
 - Travel obligations including a travel plan and sustainable transport measures.

11. Summary and Conclusions

- 11.1 This Planning Statement has been prepared by Avison Young and is submitted in support of a full planning application for the redevelopment of the Gateway Site, Land West Of The Junction With The Boulevard, Oxford Airport, Langford Lane, Kidlington.
- 11.2 This Application seeks full planning permission for the following ('the Proposed Development'):
- "Redevelopment of the site to include the demolition of existing buildings and development of new accommodation across 5 buildings for employment uses (use class E(g)(ii and iii)) plus ancillary amenity building, outdoor amenity space, car parking, cycle parking, landscaping and associated works."*
- 11.3 This Planning Statement assesses the Proposed Development against the applicable national and local planning policies and guidance and summarises the associated key planning considerations.
- 11.4 In summary, the proposed development delivers the requirements of Policy Kidlington 1 to provide new accommodation for high value employment uses at London Oxford Airport/Langford Lane. It does this via the redevelopment of under-utilised previously developed land which would not have a greater impact on the openness of the Green Belt than the existing development. This satisfies the exception at NPPF para 149(g) (first limb) (draft para 151(g)) and therefore would not be inappropriate development. Even if it were to be judged that the proposed development would give rise to a greater impact on the openness of the Green Belt (and therefore would be inappropriate development), there is a clear Very Special Circumstances case to justify this on the grounds of the significant economic/public benefits.
- 11.5 The Proposed Development has been informed by extensive pre-application consultation with the Council. It appropriately responds to, and satisfies, other planning policy and technical considerations and is accompanied by a suite of assessments to demonstrate this. This Statement demonstrates that the Proposed Development complies with the overall objectives of national and local policy and guidance. It will deliver a number of significant public benefits as set out in detail in Section 9.
- 11.6 As such, the planning application comprise 'sustainable development' and should be supported and approved without delay.

Appendix I

Planning History

Schedule for the Application Site and wider Airport ownership

London Oxford Airport

Planning History Schedule

| Reference No. | Location | Proposal/Description | Decision Date | Status |
|---------------|--|---|-------------------------|--------------------------------------|
| 22/03749/SO | Oxford Airport Langford Lane Kidlington OX5 1RA | Screening Opinion for re-development of the entrance area to London Oxford Airport, comprising the erection of five new commercial units. We make this request in pursuance of Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as updated) | 04/01/2023 | Screening Opinion Not Requesting EIA |
| 22/02641/M106 | Oxford Airport Langford Lane Kidlington OX5 1RA | Section 106A application to modify the s106 Agreement associated with applications ref: 04/02743/F and 05/01342/F. | Target Date 21/10/22 | Screening Opinion Not Requiring EIA |
| 22/02641/M106 | Oxford Airport Langford Lane Kidlington OX5 1RA | Section 106A application to modify the s106 Agreement associated with applications ref: 04/02743/F and 05/01342/F. | Target Date 21/10/22 | Pending Determination |
| 22/00679/CLUP | Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1RA East of the runway, with proposed access road from the Southeast. | Certificate of Lawfulness of Proposed Development for the erection of a new aircraft hangar building (the Main Building) to comprise workshop facilities for maintaining, storing and working on helicopters as well as ancillary office accommodation and associated facilities; erection of ancillary buildings; provision of an extended area of hardstanding (apron) to the south of the Main Building to be used for aircraft manoeuvring and stationing (parking); provision of a new surface car park to the north of the Main Building for staff and visitors; provision of an estate road to provide vehicular access to the new hangar from the south (this will connect into the existing airport internal estate road network); surface water drainage and landscape works and associated works as shown on the plans | 30/05/2022 | Prior Approval Not Required |
| 21/03264/SD | Oxford Airport Langford Lane Kidlington OX5 1RA | Screening Direction to determine whether there is a requirement for an Environmental Impact Assessment (EIA) Screening Direction pursuant to Regulation 6(10) of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (the EIA Regulations) in respect of the proposal at London Oxford Airport | 19/10/2021 | Screening Opinion Not Requiring EIA |

| | | | | |
|---------------|---|---|------------|-------------------------------------|
| 21/02505/SO | Oxford Airport Langford Lane Kidlington OX5 1RA | EIA Screening Opinion request from London Oxford Airport for a proposed relocation and expansion of the Airbus heliport facilities to a previously undeveloped part of the airport estate, on the northeast edge of the fenced estate lands | 11/08/2021 | Screening Opinion Requiring EIA |
| 21/00857/SO | Oxford Airport Langford Lane Kidlington OX5 1RA | Redevelopment of London Oxford airport - Request for an Environmental Impact Assessment | 23/04/2021 | Screening Opinion Requiring EIA |
| 20/03585/CLUP | Oxford Airport Langford Lane Kidlington OX5 1RA East of the runway, attached to the North of the existing cluster of buildings in the Southeast. | Certificate of Lawfulness of Proposed Development for site preparation works including the removal of existing surface infrastructure and incidental structures. Erection of an aircraft hangar extending to approximately 7,111 sq m (including approximately 848 sq m of ancillary office accommodation). The dimensions of the hangar are approximately 138.6m length, 44.2m width, and 16.6m (maximum) height. Provision of an estate road to provide land-side vehicular access to the new hangar from the south. To include 38 car parking spaces. Provision of an extended area of hardstanding (apron) to the west (airside) of the proposed hangar extending to approximately 1.24ha. Associated surface water drainage and landscape works including the erection of new secure boundary fencing. | 09/02/2021 | Application Permitted |
| 20/02804/SO | Oxford Airport Langford Lane Kidlington OX5 1RA | Site preparation works including the removal of existing surface infrastructure and incidental structures; Erection of an aircraft hangar extending to approximately 7,111sqm (including approximately 848sqm of ancillary office accommodation). The dimensions of the hangar are approximately 138.6m length, 44.2m width, and 16.6m (maximum) height; Provision of an estate road to provide land-side vehicular access to the new hangar from the south. To include 38 car parking spaces; Provision of an extended area of hardstanding (apron) to the west (airside) of the proposed hangar extending to approximately 1.24ha; and associated surface water drainage and landscape works including the erection of new secure boundary fencing. | 16/10/2020 | Screening Opinion Not Requiring EIA |

| | | | | |
|--------------|---|--|------------|-------------------------------------|
| 17/02190/F | <p>Land West Of The Junction With The Boulevard Oxford Airport Langford Lane Kidlington</p> <p>Adjacent to Lanford Road, just West of the roundabout</p> <p>Within Application Site Boundary</p> | Proposed pilot training school comprising a 4 storey accommodation block, 2 storey teaching and training block, parking for cars, cycles and motorcycles, access road and landscaping. | 08/01/2018 | Application Withdrawn |
| 17/00081/SO | <p>Land West Of The Junction With The Boulevard Oxford Airport Langford Lane Kidlington</p> <p>Within Application Site Boundary</p> | Screening opinion to 17/02190/F - Proposed erection of 4 storey accommodation block and 2 storey teaching and training block with access road, car parking, cycle parking and landscaping. | 11/01/2018 | Screening Opinion Not Requiring EIA |
| 17/01931/F | <p>Langford Annexe Oxford Airport Langford Lane Kidlington</p> <p>Southside of the South-eastern cluster of buildings.</p> | Change of use to Enterprise Rent-a-Car offices | 22/11/2017 | Application Permitted |
| 17/01932/ADV | <p>Langford Annexe Oxford Airport Langford Lane Kidlington</p> <p>Southside of South-eastern cluster of buildings.</p> | 1 No internally illuminated fascia sign | 22/11/2017 | Application Permitted |
| 17/01983/PAO | <p>Oxford Aviation Services Building 000 Oxford Airport Langford Lane Kidlington OX5 1RA</p> <p>Land to the North of Langford Road</p> <p>Within Application Site Boundary</p> | Construction of new premises to accommodate a pilot training campus which will include student accommodation and a teaching block | 01/12/2017 | Not Proceeded With |
| 17/01574/F | <p>Oxford Airport Langford Lane Kidlington OX5 1RA</p> <p>East of the runway, to the West of the cluster of buildings onto Langford Lane.</p> | Creation of new "crash gate" to Langford Lane to replace existing gate, formation of hardstanding to provide new crossover, and associated alterations to the highway verge | 21/09/2017 | Application Permitted |

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| 17/01491/PAO | Land Adj To Hangar 14 Oxford Airport Langford Lane Kidlington Opposite Evenlode Cres to the South of the Site. | New Hangar | 08/08/2017 | Response Sent |
| 17/00896/F | Oxford Airport Langford Lane Kidlington OX5 1RA Centre of the cluster of buildings to the Southeast Within the Application Site Boundary | Change of use of land to a rental car hire and erection of a modular building with signage | 04/07/2017 | Application Permitted |
| 17/00897/ADV | Oxford Airport Langford Lane Kidlington OX5 1RA Centre of the cluster of buildings to the Southeast. Within Application Site Boundary | 2 No. Fascia signs and 1 No. totem sign | 04/07/2017 | Application Permitted |
| 16/02114/F | Airways Aviation Academy Airspeed House Langford Lane Kidlington OX5 1RA Just West of the crescent-shaped road in the Centre of the cluster of buildings. | Change of use of office/sui generis building to use as a non-residential educational establishment (Class D1) | 13/12/2016 | Application Permitted |
| 15/00138/TPO | Oxford Airport Langford Lane Kidlington OX5 1RA To the West of the Boulevard roundabout Within the Application Site Boundary | Works to trees within G17 and G19 - Subject to TPO 41/89 as listed within the attached schedule | 27/03/2015 | Split Decision |
| 14/00047/SO | Land North Of Oxford Airport East Of Banbury Road West Of Upper Campfield Road Adj To The Straight Mile Woodstock Outside the LOA Boundary | SCREENING OPINION - Solar Farm | 05/08/2014 | Screening Opinion Not Requiring EIA |

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| 11/01128/DEM | Buildings At London Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1RA Land directly to the West of the Boulevard Within the Application Site Boundary | Demolition of buildings 1 - 7 | 04/08/2011 | Prior Approval Not Required |
| 09/00500/TPO | Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1HT Trees in the cluster of buildings to the Southeast of the Site. Within the Application Site Boundary | Fell 4 no. Cherry trees, Fell 2 no. Horse Chestnut trees, Remove deadwood and dead limb from 1 no. Cherry tree subject to TPO 41/89 & 5/90 | 15/06/2009 | Application Permitted |
| 08/01504/F | Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1HT To the South of the Crescent-shaped road. Within the Application Site Boundary | Demolition of existing gatehouse and security lodge, erection of replacement gatehouse and security lodge and associated works | 02/09/2008 | Application Permitted |
| 08/01544/ADV | Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1HT Across the cluster of buildings in the Southeast corner. Within the Application Site Boundary | 5 no. non-illuminated "RVP" signs | 18/08/2008 | Application Permitted |
| 08/01270/ADV | Hangers 6 & 7 Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1HT Northwest of the cluster of buildings. | Retrospective - 9 no. internally illuminated fascias and 2 no. flagpoles | 04/08/2008 | Application Permitted |

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| 08/00318/F | Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1HT Hanger to the Southwest of Cluster of buildings to the Southeast of the Site. | Aircraft hanger and associated development | 25/04/2008 | Application Refused |
| 07/02709/F | Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1HT Northwest of the main cluster of buildings. | Replacement building for business aviation centre (as amended by plans received 14/02/08) | 10/03/2008 | Application Permitted |
| 07/00006/SO | Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1HT. Southwest of the South-eastern cluster of buildings. | Screening Opinion - Proposed New Hanger | 05/12/2006 | Determined Application |
| 07/00550/F | Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1HT Northwest of the South-eastern cluster of buildings | Office and operational accommodation for a temporary period of 5 years | 29/05/2007 | Application Permitted |
| 06/01399/F | Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1HT Northwest of the South-eastern cluster of buildings | Portacabin for office accommodation for a temporary period of 5 years | 06/09/2006 | Application Permitted |
| 06/00747/F | Oxford Airport Langford Lane Kidlington Oxfordshire OX5 1HT North of the site, extending linearly beyond the end of the runway. Outside LOA Boundary | Instrument Landing System (ILS) including: Lighting poles, localiser, indicator mast and runway safety strip | 27/07/2006 | Application Permitted |

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| 05/02438/TPO | <p>Oxford Airport Langford Lane Kidlington Oxon</p> <p>Trees through the centre of the cluster of buildings to the Southeast</p> <p>Within the Application Site Boundary</p> | Remove lower branches to give ground clearance of 5.5m on 10 no. Horse Chestnut, 1no. Sycamore and 8 no. Cherry trees subject to TPO 41/89 | 31/01/2006 | Application Permitted |
| 05/02411/F | <p>Oxford Airport Langford Lane Kidlington Oxon</p> <p>To the South of the cluster of buildings in the southeast.</p> <p>Within the Application Site Boundary</p> | Erection of an 18m air traffic control aerial and equipment box | 17/02/2006 | Application Permitted |
| 05/02352/F | <p>Oxford Airport Langford Lane Kidlington Oxon</p> <p>To the west of the crescent-shaped road in the south eastern cluster of buildings.</p> | Erection of 5 no. portakabins on a temporary basis for three years | 17/02/2006 | Application Permitted |
| 05/00025/SO | <p>Oxford Airport Langford Lane Kidlington Oxon</p> <p>Full length of runway and extending beyond the site to the North.</p> <p>Outside the LOA Boundary</p> | Screening Opinion - Proposed runway widening, instrument landing system (ILS) and fuel farm | 30/09/2005 | Screening Opinion Not Requiring EIA |
| 05/01559/ADV | <p>Oxford Airport Langford Lane Kidlington Oxon</p> <p>On Langford lane to the South of Hangers in the South-eastern corner of the Site.</p> <p>Within the Application Site Boundary</p> | Erection of 2 No. pole mounted signs | 03/10/2005 | Application Permitted |

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| 05/01342/F | Oxford Airport Langford Lane Kidlington Oxon North of the cluster of buildings in the Southeast of the Site. | Erection of hanger | 29/12/2005 | Application Permitted |
| 05/01178/F | Oxford Airport Langford Lane Kidlington Oxon Centre of the cluster of buildings in the Southeast of the Site. | Resubmission of 04/02743/F - Erection of new aircraft hanger to replace existing buildings 21-25 Oxford Airport | 04/01/2006 | Application Withdrawn |
| 04/02743/F | Oxford Airport Langford Lane Kidlington Oxon Centre of the cluster of buildings in the Southeast of the Site. | Erection of new aircraft hanger to replace existing buildings 21-25 Oxford Airport | 29/12/2005 | Application Permitted |
| 04/02672/F | Oxford Airport Langford Lane Kidlington Oxon Southwest of the South-eastern cluster of buildings. | Erection of aircraft hanger. | 18/03/2005 | Application Refused |
| 03/02070/ADV | Oxford Airport Kidlington Oxon OX5 1SA Just West of Roundabout between Boulevard Lane and Langford road. Within Application Site Boundary | Erection of 1 No. pole mounted sign (retrospective) | 24/11/2003 | Application Permitted |
| 03/01949/F | Loom Shop Oxford Airport Kidlington Oxon OX5 1RA Centre of the cluster of building in the Southeast corner. | Erection of single storey extension. | 06/11/2003 | Application Permitted |
| 02/01474/F | McAlpine Helicopters Ltd Oxford Airport Kidlington Oxon OX5 1QZ Towards the North of the South-eastern cluster of buildings | Erection of 2 No. temporary portakabins (retrospective) | 23/08/2002 | Application Permitted |

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| 01/02112/F | McAlpine Helicopters Ltd Oxford Airport Kidlington Oxon OX5 1QZ Towards the North of the South-eastern cluster of buildings. | Demolition of existing single storey storage building and construction of new 2 storey office building. Demolition of existing entrance to Hangar 7 and construction of new entrance with new external escape staircase and car park | 07/03/2002 | Application Permitted |
| 01/00354/F | C S E Aviation Ltd Oxford Airport Kidlington Oxon OX5 1RA Within the crescent shaped road in the south-eastern corner of the Site. | Proposed temporary siting of 6 (double stacked) Rovacabins to provide temporary accommodation for 96 students | 13/12/2002 | Application Permitted |
| 01/00286/F | C S E Aviation Ltd Oxford Airport Kidlington Oxon OX5 1RA Western side of the south-eastern cluster of buildings. | Erection of temporary training classrooms | 10/04/2001 | Application Permitted |
| 01/00056/F | C S E Aviation Ltd Oxford Airport Kidlington Oxon OX5 1RA South of the south-eastern cluster of buildings | Erection of 6 (double stacked) Rovacabins to provide temporary accommodation for 96 students at Oxford Airport | 16/02/2001 | Application Withdrawn |
| 00/01809/F | McAlpine Helicopters Ltd Oxford Airport Kidlington Oxon OX5 1QZ North of the south-eastern cluster of buildings. | Demolition of existing single storey office building. Erection of 2 storey office building, a two storey workshop building and a self contained paint spray booth | 24/11/2000 | Application Permitted |
| 99/01925/F | McAlpine Helicopters Ltd Oxford Airport Kidlington Oxon OX5 1QZ The centre of the south-eastern cluster of buildings | Temporary installation of 3 No. stacked portable buildings and repositioning of existing stacked portable building to form temp. office accommodation of staff while demolition and building of new offices takes place (ref. 99/01633/OUT) | 14/02/2000 | Application Permitted |
| 99/01633/OUT | McAlpine Helicopters Ltd Oxford Airport Kidlington Oxon OX5 1QZ North of the south-eastern cluster of buildings. | Demolition of existing single storey office building. Erection of 2 storey building for offices and workshops together with a self contained spray booth (OUTLINE) | 30/12/1999 | Application Permitted |

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| 98/02188/F | McAlpine Helicopters Ltd Oxford Airport Kidlington Oxon OX5 1QZ North of the south-eastern cluster of buildings. | Erection of two storey modular building to provide office space | 10/05/1999 | Application Permitted |
| 98/01937/F | Aviations Health And Fitness Club Oxford Airport Kidlington Oxon OX5 1RA South of the south-eastern cluster of buildings. Within the Application Site Boundary | Removal of Condition 4 of CHS.904/88, (That the leisure centre hereby approved shall be used by students undertaking courses at the flying school only). RETROSPECTIVE | 08/03/1999 | Application Permitted |
| 98/01912/F | C S E Aviation Ltd Oxford Airport Kidlington Oxon OX5 1RA West of the south-eastern cluster of buildings. | Renewal of temporary Planning Permission (Ref. 96/01565/F) to allow the retention of portakabin for short course instructors | 19/03/1999 | Application Permitted |
| 98/01497/F | Cylinder Shop Oxford Airport Kidlington Oxon OX5 1RA South of the south-eastern cluster of buildings. Within the Application Site Boundary | Single storey extension to cylinder shop to provide improved facilities | 16/10/1998 | Application Permitted |
| 98/00190/F | McAlpine Helicopters Ltd Oxford Airport Kidlington Oxon OX5 1QZ North of the south-eastern cluster of buildings. | Temporary installation of two stacked portable buildings as office accommodation | 15/04/1998 | Application Permitted |
| 98/00011/F | Hanger 8 Oxford Airport Kidlington Oxon OX5 1RA | Proposed alteration to Hanger 8. Removal of existing door and extension to door opening | 10/03/1998 | Application Permitted |
| 97/01225/F | Hanger 4 Oxford Airport Kidlington Oxon OX5 1RA Within the Application Site Boundary | Alterations to Hangar 4 to increase height to ridge on end section. Extension to be built over existing 2 bays | 26/08/1997 | Application Permitted |

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| 97/00097/F | C S E Aviation Ltd Oxford Airport Kidlington Oxon OX5 1RA South of the south-eastern cluster of buildings. | Temporary siting of 2 No. portakabins for replacement accommodation for leisure centre staff. | 03/03/1997 | Application Refused |
| 97/00043/F | General Aviation Centre (Helicopters) Oxford Airport Kidlington Oxon West of the south-eastern cluster of buildings. | Demolish existing timber framed buildings and replace with single storey extension to the existing Simulated Flight building. | 03/03/1997 | Application Permitted |
| 97/00053/F | Engineering Training Centre Oxford Airport Kidlington Oxon Northwest of the south-eastern cluster of buildings. | Demolition of existing World War II single skinned classroom building and adjoining timber framed/clad 60's building. Construction of new classroom block for Engineering Training Centre with associated office accommodation. | 10/04/1997 | Application Permitted |
| 96/01794/F | Operations Building Oxford Airport Kidlington Oxon West of the south-eastern cluster of buildings. | First floor extension to existing Airport Operations Building for the relocation of offices and teaching facilities and the reinstatement of student accommodation in the Cherwell B Building. | 23/12/1996 | Application Permitted |
| 96/01565/F | C S E Aviation Ltd Oxford Airport Kidlington Oxon OX5 1RA South of the south-eastern cluster of buildings. Within the Application Site Boundary | Temporary siting a portakabin for short course instructors | 23/12/1996 | Application Permitted |

Appendix II

Applicant Response to

Pre-Application Advice received on 13/07/22

London Oxford Airport – Gateway Site

Response to Pre-Application Advice

This note on behalf Oxford Aviation Services Ltd, responds to the pre-application advice set out in the letter from Cherwell District Council dated 13 July 2022. The note should be read in conjunction with the accompanying Pre-Application Document prepared by Spratley & Partners and the Transport Scoping Report Update prepared by TPP.

| CDC Pre-Application Comments 13/7/22 | Response |
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| <p>Green Belt / Policy</p> <p>The proposed new development which is more significant in terms of its scale and amount of floorspace is, by definition, inappropriate development within the Green Belt and therefore harmful to its character, appearance and openness and thereby also contrary to Policy ESD14 and the NPPF.</p> <p>Given the containment by existing development and the findings of the Cherwell Green Belt studies on the contribution of Parcels 1A and PR118a, it is considered that it is unlikely that there would be an unacceptable impact on the openness of the Green Belt</p> | <p>We previously addressed the policy case for comprehensive redevelopment of this previously developed land within the Green Belt, in our Pre-Application Planning Statement (November 2021). This set out the intention to satisfy the exception at NPPF para 149(g), in which case the development proposals should not be regarded as inappropriate development.</p> <p>The site comprises previously developed land within the Green Belt, where the NPPF and Local Plan Policies GB3 and ESD14 all support the principle of development. Local Plan Policy GB3 is not entirely consistent with the NPPF and Local Plan Policy ESD14 defers to the NPPF for the purposes of assessing development proposals. Accordingly, in our view the NPPF provides the principal Green Belt policy basis for determining the acceptability of the proposal.</p> <p>The exception at NPPF para 149(g) (limb 1) refers to the following:</p> <p><i>Limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would</i></p> |

| CDC Pre-Application Comments 13/7/22 | Response |
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| <p>The re-development is contrary to saved Policy GB3 of the adopted Cherwell Local Plan 1996 and is classified as inappropriate development within the Green Belt. Any subsequent application will therefore need to provide an exceptional circumstances case accordingly.</p> <p>In order to justify very special circumstances that any subsequent application must include evidence that there is a market for the intended uses in this particular location, especially having regard to the current new development at Bebroke Science Park.</p> | <p><i>not have a greater impact on the openness of the Green Belt than the existing development.</i></p> <p>The proposed development comprises the redevelopment of previously developed land which has been designed with the aim of not having a greater impact on the openness of the Green Belt than the existing development.</p> <p>Whilst the proposed building footprint has increased since the previous pre-application proposals from 8,240sqm to 10,103sqm, we remain of the view that the proposals would not have a greater impact on the openness of the green belt, having regard to a range of factors, including the existing building footprint and that which previously existed but has been demolished. Furthermore, the site is enclosed by existing buildings which will screen views of the proposed buildings and provide an existing backdrop of built form, preventing outward views through the Green Belt. The proposed buildings are sited to allow for views into the site and would not block any notable existing views through the site or materially increase building heights relative to previously established heights.</p> <p>On this basis, we consider that the proposals would not have a greater impact on the openness of the Green Belt than existing development. As has been acknowledged in the pre-application advice in relation to the previous proposals, taking account of the findings of the Cherwell Green Belt studies it was considered unlikely that there would be an unacceptable impact on the openness of the Green Belt.</p> <p>In the event that it is agreed that there is not greater impact on the openness of the Green Belt, the proposals would not be classified as inappropriate development in the green belt.</p> <p>Notwithstanding, should officers remain of the view that the proposals would be deemed inappropriate development, we consider that there are very special circumstances that clearly justify the proposed development within the green belt,</p> |

| CDC Pre-Application Comments 13/7/22 | | Response |
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| | | having regard to relevant policy tests. The very special circumstances have been outlined in the previous Planning Statement and will be set out as part of the planning application. As advised by the Council, this will include evidence of the market for the proposed uses, which will make a significant contribution to high value employment uses in accordance with Policy Kidlington 1 and an Economic Assessment addressing the benefits of the proposals to the local economy. |
| Existing Occupiers | Several of the buildings are still occupied, notably one of the hangars and a gym which occupies one of the buildings. Any subsequent application would need to address this issue, as we would not wish to lose these occupiers from the District and if they are not to remain on this site, there must be suitable and available alternative provision as it is vital to both Kidlington and Cherwell's economy that these are retained and not lost. | <p>The former MOD building (Langford Hall) was demolished in July 2022, which provided accommodation associated with pilot training and teaching. These functions continue to operate on the airport site. The existing temporary accommodation for CAE is being related to another facility within the airport (Cherwell B).</p> <p>The two remaining hangars are continuing to be used for storage in connection with the airport operation at this time.</p> <p>The existing gym facility, which is currently occupied by Vida Health and Fitness, will not continue to operate on site. The operator's intentions for relocation of their business are not known at this time. It would be anticipated that there would be suitable alternative accommodation in the wider area, dependent upon the operator's continuing requirements.</p> |
| Layout / Design | It does not include an analysis of the site's constraints and opportunities and therefore in particular does not consider existing trees and areas of open space currently on the site. | <p>The Pre-Application Document (Section 1) provides a comprehensive assessment of the site and its context. This includes a further assessment of the site's constraints and opportunities informed by a landscape appraisal undertaken by Colvin & Moggridge Landscape Architects. The analysis of the site context includes consideration of existing built form and massing and views, including context sections to inform the assessment of appropriate building heights and massing.</p> <p>The assessment of constraints and opportunities, includes consideration of existing landscape conditions, trees, vegetation and open space. This has been informed by an arboricultural assessment. It is noted that there is little of landscape value on the</p> |

| CDC Pre-Application Comments 13/7/22 | Response |
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| | <p>existing site, which features several areas of poor-quality hardstanding and gravel following demolition of Langford Hall. These offer very limited visual or environmental amenity and offer significant potential to enhance this part of the green belt. There are higher quality mature trees along the Boulevard and the opportunity is identified to enhance and strengthen the landscape site boundary, as part of a comprehensive site-wide landscaping scheme.</p> <p>Local viewpoints are identified which present opportunities to enhance the visual amenity of the local area through high quality design and landscaping. A key opportunity is to improve the appearance of the gateway to the airport, arriving off the roundabout, by creating a landscaped open corner to provide an inviting pedestrian/cycle entrance to the site.</p> |
| <p>Boundaries with Langford Lane and The Boulevard also laid to grass and contain a number of existing trees and hedges which should be retained within the proposed scheme, unless there is overriding justification for their removal and replacement planting elsewhere on the site.</p> <p>A tree survey must be submitted with any subsequent application and the proposed scheme must seek to retain existing vegetation as far as possible in the first instance. Any removal of existing trees and vegetation will need to be justified accordingly.</p> | <p>An arboricultural assessment has been produced by DeltaSimons. The assessment notes that there are a limited range of tree species on the site and many of the trees have been topped/pollarded and have very little significance as part of the landscape. Given the site's current use and the past pruning of tree, the assessment advises that consideration should be given to replacing the current trees with species which are more suitable to the location and purpose of the Site.</p> <p>The assessment identifies an existing group of trees along the boundary of the site with The Boulevard. These are classified as Category B with moderate value and where retention is desirable. The assessment considers this tree group to have some landscape value in lining the main access road to the site.</p> <p>The proposed landscape strategy is set out in Section 3.4 of the Pre-Application Document. The intention is to retain existing mature trees along The Boulevard Boundary, and the hedgerow bounding Langford Lane, as part of a comprehensive landscaping scheme for the site. The proposals will include an increase in the quantity and quality of green space and landscaping across the site to improve outlook and visual amenity. The landscaping scheme will enhance the largely cleared waste</p> |

| CDC Pre-Application Comments 13/7/22 | Response |
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| | <p>ground and will create a series of high-quality landscaped routes, spaces and views through the site, including open green space adjacent to the junction of Langford Lane and The Boulevard leading into and central landscaped courtyard. The planting scheme will include new native specimen trees.</p> |
| <p>Re-development of the site as proposed where buildings are higher and proposed closer to the boundaries of the site would have potential for significant additional visual impact on the immediate locality to that existing which must be fully assessed through a visual impact assessment</p> | <p>As addressed in the Pre-Application Document, careful consideration has been given to the layout and design of the proposed buildings having regard to the potential impact on views from the surrounding area. Local viewpoints have been identified and a visual impact assessment is being prepared by Colvin & Moggridge and will form part of the planning application.</p> <p>It is not considered that the proposed development would have a significant visual impact on the immediate locality. Whilst the new buildings will be visible in some local views, most notably along Langford Lane and from within the existing airport site, the established character and appearance of the immediate area is of large footprint industrial and commercial buildings of 2-3 storeys in height, as is demonstrated in the assessment of context in the Pre-Application Document. The site is bounded by existing buildings of similar massing on all sides, as is clearly seen by the context plan in section 3.3 of the document. This includes established building lines along Langford Lane. Furthermore, as is shown by the existing sections and views across the site, there is an established backdrop of large buildings forming a backdrop in existing views, including those views across the site afforded by the recent demolition of Langford Hall.</p> <p>The proposed layout and massing of development is informed by the assessment site context and as demonstrated by the proposed massing in context at Section 3.3 of the Pre-Application Document, the proposed building footprint is entirely compatible with the established urban grain, including that of Oxford Technology Centre to the south.</p> <p>Furthermore, the buildings are arranged to allow views into and across the site from Langford Lane and The Boulevard, where possible through the retained landscaped screening and noting the retained hedgerow along Langford Lane. Views will be</p> |

| CDC Pre-Application Comments 13/7/22 | Response |
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| | <p>created into the central landscaped courtyard and along the principal landscaped access routes into and through the site. This retains openness and will significantly enhance the appearance of the site, making a positive contribution to the visual amenity of the immediate area, as will be demonstrate by the Visual Impact Assessment.</p> |
| <p>The scheme must also provide a well-designed approach to the urban edge, which achieves a successful transition between town and country environments. To this end, it is considered that the proposed buildings should be set back from both the Langford Lane and The Boulevard boundaries.</p> | <p>As addressed above, and demonstrated in the Pre-Application Document, it is considered that the proposed design would make a significant positive contribution to the surrounding townscape, through the layout, design and use of high-quality materials, which respond to the established character of the commercial context.</p> <p>The layout of the proposed buildings is designed to respond to and enhance the character and appearance of the area. The positioning of buildings relates to established building lines, including along Langford Lane, as evidenced by the context assessment in Section 3.3 of the Pre-Application Document. In response to pre-application feedback, the buildings have been re-orientated and set back along the Boulevard, behind the retained and enhanced landscaping buffer to provide an attractive entrance into the airport site. This also allows for the creation of a large landscape courtyard, which will provide an amenity hub for the development.</p> <p>The proposed buildings are of an appropriate height, in keeping with prevailing building heights and massing and will provide varied and interesting rooflines with pitches responding to existing buildings, as shown on the proposed visualisations in section 4 of the document.</p> <p>The proposed building line along Langford Lane is considered appropriate to respond to the established buildings fronting the road in this area. The buildings are set back behind a retained hedge and access road and this area will benefit from further landscaping enhancements as shown in the Pre-Application Document. The design of high-quality buildings, with contextual elevations and rooflines is considered to make a positive contribution to the local townscape, both in keeping and enhancing the</p> |

| CDC Pre-Application Comments 13/7/22 | | Response |
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| | | existing character and appearance and providing an appropriate transition with effective use of landscaping. |
| | Existing hedge to Langford Lane must be protected and retained and existing open space and tree planting along The Boulevard which must also be protected and retained/enhanced. Suggest that consideration is given to the provision of a wider landscape tree and grass buffer to the Langford Lane. | As addressed above and in the Pre-Application Document, the proposed landscaping scheme for the site retains the existing hedgerow and the Langford Lane boundary and further enhances this edge with new planting which improve views along this route. The existing landscaping along The Boulevard will also be retained and enhanced, to provide an attractive entrance, to reinforce this as a gateway location. |
| | Not convinced that the design and appearance of the buildings proposed, in particular those adjacent to the Langford Lane/Boulevard roundabout and access provide the 'gateway development' envisaged by the Development Plan. Further consideration must be given to this area, both in terms of the function of the buildings here and the need to set the buildings away from the boundary having regard to adjacent development and existing trees. | <p>Further information has been provided in Section 3.2 relating to studies of site arrangement and the approach towards creating a 'gateway'.</p> <p>It is considered that the updated design and layout of development would create a gateway with a strong sense of arrival to the site, as sought by Policy Kidlington I. This would be achieved through a combination of high-quality open space and landscaping adjacent to the site entrance, and well-designed buildings, incorporating good quality materials and finishes that would enhance the appearance of the area.</p> |
| Highways | The pre-application document states that roads have been designed to accommodate a Refuse Collection Vehicle up to 10m in length. However, the swept path analysis drawing in the | <p>The proposed refuse store locations are provided within Section 3.12 of the Pre-Application Document.</p> <p>The Transport Scoping Report Update provides swept path analysis for both a 10m rigid HGV and a 10.6m long refuse vehicle in line with the vehicles operated by CDC. The</p> |

| CDC Pre-Application Comments 13/7/22 | Response |
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| <p>Transport Scoping Report illustrates an 11.2m long vehicle. For information, Cherwell District Council operate the Olympus 23W 6x2 Rear Steer, which is 10.6m long. Refuse collection must be clarified further.</p> | <p>swept path analysis identifies visibility splays for the site access from The Boulevard. This demonstrates that the road layout satisfactorily accommodates the required servicing vehicles.</p> <p>The proposed arrangements for refuse collection are addressed in Section 3.12 of the Pre-Application Document. This shows that each of the proposed buildings will be provided with dedicated covered bin stores which are located to allow for ease of collection from the internal roads, having specific regard to the manoeuvring of refuse and servicing vehicles, as addressed in the Transport Scoping Report.</p> <p>In accordance with Local Plan Policy ESD15 a holistic the layout of the development is planned to integrate access, parking and servicing arrangements, having regard to The Manual for Streets.</p> |
| <p>Car Parking</p> <p>Parking provision should be justified with a first-principles approach</p> <p>All parking bays should be a minimum of 5.0m x 2.5m, with a 6m clear space for manoeuvring</p> <p>25% of all parking bays must be provided with EV charging points</p> | <p>Parking arrangements have been described in Section 3.4 of the Pre-Application Document and the strategy, taking account of ‘first principles approach’, is outlined further in the Transport Scoping Report Update.</p> <p>In accordance with the NPPF and Policy SLE4, the proposals will facilitate and promote the use of sustainable transport, including use of public transport, walking, and cycling as well as providing for an appropriate level of car parking.</p> <p>The level of proposed car parking has been calculated based upon the estimated employment density of 396 projected employees and mode share data which indicates 81.2% of employees are expected to be car drivers. A total of 322 car parking spaces are proposed for employees, at a ratio of 1 space per 60.3sqm floorspace. An allowance is also made for an additional 16 spaces for visitors. This would not exceed the relevant maximum parking standards.</p> <p>It is confirmed that all parking bays will be designed to meet the minimum space requirements.</p> |

| CDC Pre-Application Comments 13/7/22 | Response | |
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| | | <p>The provision of EV charging points is addressed in Transport Scoping Report Update having regard to the Oxfordshire Electric Vehicle Infrastructure target for 25% of all car parking spaces to be provided with EV charging points. It is noted that electrical load generated by circa 81 EV charging units would be significant. It would be necessary for these to include payment systems and for their operation to be managed. Taking account of the feasibility of providing for the required electricity.</p> |
| <p>Cycle Parking</p> | <p>Cycle parking provision must be secure, weatherproof, and well distributed around the site. Provision of non-standard and electric cycles should be included. Cycle parking and EV charging points to be provided on site.</p> | <p>The provision of a high standard of new cycle parking facilities is a key principle for the development proposals. The Pre-Application Document, at Section 3.5, shows how cycle parking is planned throughout the development to serve each of the proposed buildings. All parking allocations for the proposal will be provided on-site at surface level, and parking allocations have been consolidated around the proposed buildings to maximise green space and ensure flexibility of building use. Cycle parking will be accommodated in secure storage facilities, integrated within the overall design and landscaping plans for the site and located to promote accessibility by occupiers and visitors.</p> <p>Cycle parking has been calculated in accordance with local planning policy and has been apportioned using mode share data, as addressed in the Transport Scoping Report Update. This indicates that provision of 80 cycle parking spaces would be expected to serve the estimated maximum employee number of 396 people, plus an additional 10% provision for visitors.</p> <p>The Transport Scoping Report Update addresses the reasoning as to why it is considered that specific provision for E-bike charging need not be provided within the proposed cycle storage facilities.</p> |
| <p>Pedestrian/Cycle Infrastructure</p> | <p>A shared use cycle track has recently been constructed along the south side of Langford Lane, heading west from the roundabout with The Boulevard.</p> | <p>The Transport Scoping Report addresses the existing and planned pedestrian and cycle infrastructure in the context of the site. It also considers the likely pedestrian movements to and from the proposed development. It indicates that the most pedestrian movement would occur between the site and the existing bus stop but notes that the</p> |

| CDC Pre-Application Comments 13/7/22 | Response |
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| <p>The proposed development will be expected to provide a safe crossing for pedestrians and cyclists to that facility, most likely in the form of a Toucan Crossing.</p> <p>A contribution towards the provision of a similar cycletrack east of the roundabout is likely so that an off-road route may be created to the A4260 which has a shared use route to Kidlington</p> | <p>level of movements would be low, as would be the movements across the roundabout. It advises that the current informal crossing points with central islands would adequately accommodate these pedestrian flows.</p> <p>Taking account of the predicted flows, access points will be located along the eastern boundary of the Site to improve permeability for pedestrians and cyclists, and those using the bus stop on The Boulevard. Within the wider site, high level street lighting along footpaths and roads will also be implemented to enhance wayfinding around the site.</p> <p>The Transport Scoping Report Update identifies the OCC cycle route improvements for Langford Lane and sets out a schematic plan of the proposals that it is expected would be brought forward by OCC. The proposed development could directly connect into these enhancements to the cycle network on the northwest of the roundabout into the site, integrated with pedestrian movements.</p> <p>It is anticipated that the improvements to the cycle network would be funded by OCC and implemented as part of their wider walking and cycling strategy for Kidlington.</p> |
| <p>Travel Plan</p> <p>A Framework Travel Plan for the site is required. Further subsidiary travel plans or statements may be required, depending on the size of the individual units. This should be confirmed at full application stage when further information is available.</p> <p>A £2,563 (RPI index linked) monitoring fee will be required for the framework Travel Plan. Further monitoring fees will be requested depending on the size of the units.</p> | <p>A Framework Travel Plan will be prepared in accordance with OCC guidance. We will further discuss any requirement for subsidiary Travel Plans based upon the updated proposals set out in the Pre-Application Document.</p> <p>A Travel Plan monitoring fee will be included within the S106 heads of terms.</p> |

| CDC Pre-Application Comments 13/7/22 | | Response |
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| Flood Risk / Drainage | <p>The Sustainable Drainage Systems (SuDS) Policy requires the use of sustainable drainage systems to manage runoff.</p> <p>In addition to dealing with surface water runoff, they are required to provide water quality, biodiversity and amenity benefits.</p> <p>Major development must be submitted with a Surface Water Management Strategy.</p> <p>Surface water management must be considered from the beginning of the development process and throughout – influencing site layout and design.</p> | <p>The management of surface water and run-off from the proposed buildings is a key consideration in the design of the proposed development and a range of strategies will be implemented to ensure sustainable management of surface water run-off having regard to relevant policies. Section 3.11 of the Pre-Application Document addresses the intended SuDS for the scheme.</p> <p>The existing surface water drainage network is outdated, and it is proposed to remove and replace this with a new system as part of the overall development works. The applicant is engaging with the water authority in relation to the proposed drainage strategy.</p> <p>The potential for re-use of attenuated rainwater for landscape irrigation is under review by the design team as a potential means of reducing water demand for the development, in accordance with the principles set out in Policy ESD1 of the Local Plan.</p> <p>A Surface Water Management Strategy is being prepared to accompany the planning application which will demonstrate how the proposals comply with Policy ESD7.</p> |
| | <p>A site-specific Flood Risk Assessment (FRA) is also required.</p> | <p>A Flood Risk Assessment will be provided accordance with NPPF and policies Kidlington 1 and ESD6 of the Local Plan.</p> |

| CDC Pre-Application Comments 13/7/22 | | Response |
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| Energy/Sustainability | <p>Energy Statement to be submitted</p> <p>All new non-residential development will be expected to meet at least BREEEAM 'very good'</p> <p>Include a feasibility study for the provision of District Heating and Combined Heat and Power. Where this is demonstrated to be viable it should be provided on site.</p> | <p>An Energy Strategy is being prepared, which includes a BREEAM assessment in accordance with NPPF and Local Plan Policy ESD2. The intention is to target at least BREEAM Very Good in accordance with Policy ESD3.</p> <p>As addressed in the Pre-Application Document, buildings will be designed with high-quality, thermally efficient cladding and roofing materials. Energy-generating strategies, such as PV panelling, will be implemented on the roofscapes, which have been considered to maximise south-facing roof planes where possible to assist in reducing the overall energy demand of the scheme. The design measures include innovative use of cladding and passive solar shading strategies</p> <p>The Energy Strategy will include a feasibility study of district heating and CHP.</p> |
| | <p>Include a feasibility assessment for the potential of on-site renewable energy in accordance with Policy ESD5.</p> | <p>The Energy Strategy will address a range of strategies and measures to reduce carbon emissions and to promote a sustainable form of development. In addition to energy efficient buildings, this includes the provision of photovoltaic panels at roof level to provide renewable energy in accordance with Policy ESD5.</p> |
| Ecology/ Biodiversity | <p>Achieve a net gain in biodiversity</p> | <p>The proposals include a comprehensive landscaping scheme, including new and replacement vegetation that would improve the existing condition of the site and its contribution to biodiversity. In accordance with Policy Kidlington I, the proposals will preserve and enhance biodiversity.</p> <p>An initial Ecological Appraisal has been undertaken to inform the proposed landscaping and biodiversity measures to be incorporated into the development with the aim of contributing to improved biodiversity, having regard to the requirements of Local Plan Policy ESD10. This includes relevant habitat and species surveys. The proposed biodiversity measures will be addressed as part of the planning application.</p> |

| CDC Pre-Application Comments 13/7/22 | | Response |
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| Heritage Assets | The proposal is in an area of historical and archaeological interest. Works should be monitored by an archaeological watching brief | The impact on heritage assets will be addressed in the Archaeological Assessment and watching brief to be submitted with the planning application. |
| Planning Obligations | Likely that a Section 106 Agreement will be required | The applicant will continue to engage with the Council to establish and agree heads of terms for any necessary and appropriate planning obligations in respect of the development proposals. |

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