

**Q4.** *Please tell us below why you consider the document to be unsound, not legally compliant or fails to comply with the duty to co-operate. If you do believe the document is sound, legally compliant, or complies with the duty to co-operate you may use the box to explain why.*

**Chapter 2 (Glossary):**

1. Policy H9 - which deals with the location of student accommodation - cites a number of suitable locations for student accommodation, one of which is "on or adjacent to an existing university or college campus or academic site". The same wording is used at Policy H3, and a reference is made to a glossary definition, however no such definition is included in the glossary which supports Chapter Two of the Draft Plan.

**Omission site:**

2. Oriol College has longstanding ownership of the Former Bartlemas Nursery School (allocated as ref. #346 in the Housing and Employment Land Availability Assessment). Background Paper 15b which accompanies the Draft Local Plan explains how sites were selected for allocation in the Draft Plan. Sites were identified and audited through a three-stage process where policy and environmental constraints were analysed, then sites were assessed against the objectives of the Sustainability Appraisal, before deliverability was considered. Finally, Preferred Options for site allocations were subjected to further detailed assessment to inform more detailed policy drafting – this included a further assessment of each individual site against the refined policy approaches in the Plan and a review of the intentions of the landowner.
3. With regard to the Bartlemas Nursery site, the Council has not allocated it on the basis that it is considered unlikely to deliver 10 or more dwellings and that the site is not consistent with the locational strategy for student accommodation which restricts the delivery of student accommodation to locations on or adjacent to existing university or college campus or academic site, on or adjacent to a hospital or research site, within the city centre or a district centre or on a site which is allocated in the development plan to potentially include student accommodation.
4. Whilst we would agree that the site is located outside of the Cowley Road District Centre, the site is on the cusp of the District Centre Area. Planning permission was sought in 2018 for the redevelopment of the site, which included the removal of existing nursery buildings and their replacement to provide graduate accommodation and a warden's flat (OCC Ref: 18/02989/FUL). The proposal included 21 student rooms with a communal kitchen and dining room as well as 9 self-contained 1 or 2 bed units.

5. In accordance with the Technical Note which supports the Government's Housing Delivery Test (last update published on 19<sup>th</sup> December 2023), housing delivery numbers can be derived from the delivery of student accommodation by dividing each authority's student bedrooms net change by the national ratio of 2.5, which gives a figure for net additional dwellings.
6. In the case of the 2018 application, this would have delivered 9 self-contained units, in addition to the 21 student rooms which one would divide by a factor of 2.5 (i.e. 8.4 additional dwellings).
7. This amounts to a net increase across the site overall of 17.4 dwellings. It is therefore unclear upon what basis Officers have considered that the site's ability to accommodate more than ten dwellings has not been proven.
8. The recommendation of the Case Officer – set out in the report to Planning Committee dated 8<sup>th</sup> September 2020 - was that the amount and density of development proposed at that time was suitable for the site, notwithstanding the location of the site within the Conservation Area as well as within the setting of Grade I and Grade II\* listed buildings. Officers were persuaded that the level of harm would be outweighed by the public benefits associated with the provision of student accommodation and the benefits associated with a positive reuse of a longstanding vacant brownfield site.
9. Notwithstanding that the site is located outside of the designated Cowley Road District Centre, Officers concluded that the proximity of the site to Cowley Road and the sustainability of the location with regard to public transport, services and facilities were such as to outweigh the modest conflict with the locational criteria of Policy H8 of the Oxford Local Plan 2016-2036 ("location of student accommodation"). The recommendation of Officers was to approve the application, albeit the Planning Committee resolved to refuse permission based on the conflict of the proposed development with Policy H8.
10. Oriel College has a large portfolio of sites which it owns in and around Oxford. Not all of them are deliverable due to a range of constraints. At the same time, the College faces pressure to provide accommodation not only for undergraduate students, but also postgraduate students and academic staff. Given the limited number of sites in its portfolio that the College has upon which to deliver such accommodation, the prospect of the Nursery Site being sold to a developer to provide market housing is remote.
11. The College would sooner retain the site and wait for an opportunity to meet its own needs. In this sense, with the right policy context the site is both available and deliverable if allocated either for graduate accommodation (which would overcome the conflict with Policy H8 of the Current Local Plan 2016-2036 as well as Policy H9 within the Draft Local Plan 2040) or for employer-linked affordable housing within the scope of Policy H5 of the Local Plan.