



Chadwick Town Planning

Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

By email only to: planningpolicy@oxford.gov.uk

3rd January 2024

Our Ref: [REDACTED]

Dear Sir/Madam

Representations on the Oxford Local Plan 2040 Submission Draft (Regulation 19) – Consultation November – January 2023

We are pleased to submit these representations on the *Oxford Local Plan 2040 Submission Draft* (Regulation 19) on behalf of our clients, the Rector and Fellows of Lincoln College ('Lincoln College' or 'the College'). We ask that these representations be read in conjunction with Lincoln College's representations dated 13th November 2022 on the *Oxford Local Plan 2040 - Preferred Options* (September 2022) Regulation 18 [Part 1] Consultation and dated 23rd March 2023 on the *Oxford Local Plan 2040 - Housing Need* Regulation 18 [Part 2] Consultation.

In light of the above, we are very pleased to see that our previous representations have been taken into account in the preparation of the Submission Draft Local Plan via the incorporation of Lincoln College's Sports Ground and associated land at Bartlemas Close – along with the adjacent Jesus College Sports Ground - within Policy SPE17 of the Draft Local Plan. Lincoln College's land, which extends to some 2.35 hectares, is shown in Figure 1 below.

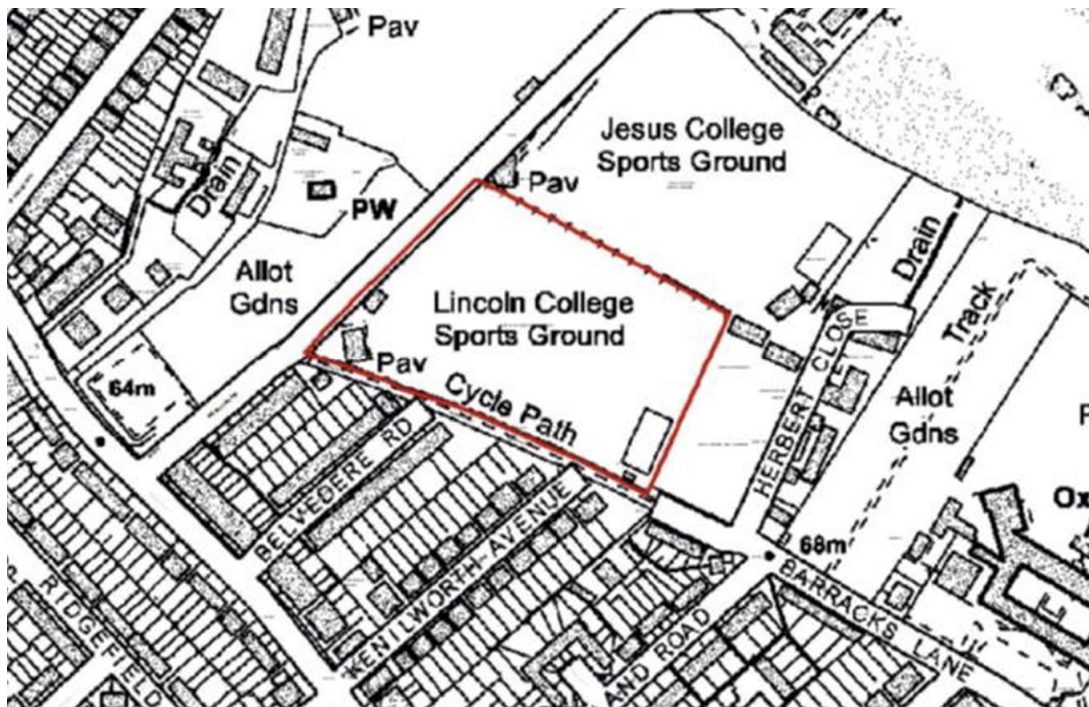


Figure 1 – Lincoln College's Land

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We are also pleased to note that Policy SPE17 allocates the land for residential development, including graduate accommodation, which is wholeheartedly supported by the College.

1. **Soundness** SPE17 - support and think it is sound.

The inclusion of graduate accommodation in Policy SPE17 of the Draft Local Plan is an important and welcome addition to existing Policy SP43: Lincoln College Sports Ground allocation in the adopted *Oxford Local Plan 2036* in that it adds greater flexibility to the type of residential development that may come forward on the site. This positively contributes towards the "soundness" of the Draft Local Plan – as explained below - as it is:

b) *Justified* – being an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) *Effective* – deliverable over the plan period; and

d) *Consistent with national policy* – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework ('NPPF') and other statements of national planning policy, where relevant.

2. **Enhancing Deliverability**

It also contributes to the deliverability of the site, which is available for housing, offers a suitable location for development and is achievable with a realistic prospect that housing will be delivered on the site within five years.

Paragraph 63 of the NPPF encourages local planning authorities ('LPAs') to assess and reflect the needs of different groups in the community (including students) in planning policies. Paragraph 70 of the NPPF recognises the important contribution that small and medium-sized sites can make to meeting the housing requirement of an area and states that to promote the development of a good mix of sites, LPAs should work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes. This has been achieved in this instance with the City Council and the allocation of the College's land within Policy SPE17 of the Draft Local Plan.

3. **Balancing Student and General Housing Needs**

This is all crucial in helping to meet the housing needs of the city, ensure a 5-year supply of deliverable housing land and retain an acceptable balance between student accommodation and meeting the needs of the general and affordable housing market in Oxford. The City Council's *Authority Monitoring Report 1st April 2022 to 31st March 2023* ('AMR'), published in December 2023, states that the Council is committed to supporting the sustainable growth of the two universities and thus maximising the related economic, social and cultural benefits which they bring to Oxford. However, it is also recognised in the AMR that the city is constrained spatially, with limited availability of land within the city boundary and competing demands for development sites in the city for several vital uses, most demonstrably housing. The Draft Local Plan seeks to balance these competing demands by encouraging the best use of land and ensuring that the growth of the universities and their associated activities remains at sustainable levels and is focused on the most suitable locations.

This would be achieved via Policy SPE17, which enables the Colleges to focus growth on their own sites, by making the best use of their current holdings, including meeting their own Collegiate accommodation needs, as well as redevelopment and intensification, as appropriate.

4. **Importance of Graduate Accommodation**

According to the AMR, there were 14,653 full-time University of Oxford students with accommodation requirements, with 13,975 accommodation places¹ provided across the collegiate

¹ As of 1 December 2022

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University leaving a total of 678 students living outside University-provided accommodation in Oxford, which is within the threshold set in Policy H9 of the *Oxford Local Plan 2036*. The University has seen an increase in the total accommodation places provided from the previous monitoring period (13,382 to 13,975) which along with a slight decrease in the total number of students attending the University results in a healthy buffer to the 1,500 student threshold in Policy H9 thereby opening up more housing opportunities for the wider community in the city. This illustrates the efforts made by the University and the Colleges in meeting their own housing needs and demonstrates the success of Policy H9 since the adoption of the *Oxford Local Plan 2036 in 2020*.

5. Meeting the City's Housing Requirement

However, with an objectively assessed housing need of 1,322 new dwellings per annum² in Oxford, provision being made for 9,612 new homes to be built in Oxford over the plan period 2020-2040 at an average of 481 per annum³ and a 5-year housing land supply estimated at just 5.24 years [with a 10% buffer] sites such as the College's land at Bartlemas Close are essential in ensuring an adequate and deliverable supply of housing land to meet Local Plan requirements and the community's housing needs to 2040.

As per *Planning Practice Guidance*⁴, student accommodation can be counted in housing land supply figures and in the 2022/23 monitoring year 266 (net) units of student accommodation were completed in Oxford. Using the ratio of 2.5:1 (as set out in Paragraph 10 of the Housing Delivery Test Measurement Rule Book) this equates to 107 equivalent dwellings being added to Oxford's housing market. This is some 22% of the average target total of 481 per annum and therefore a very important contribution towards meeting the housing requirements in the city.

6. Lincoln College's Land at Bartlemas Close (Policy SPE17)

The College supports the inclusion of its land within the Policy SPE17 allocation in the Draft Plan and is confident that the housing [and other detailed] requirements of the policy can be satisfied, which may come forward individually as a minimum of 26 dwellings each on land in the Jesus College and Lincoln College ownerships (or, if delivered as non-self-contained student accommodation, the number of rooms that equate to this when the relevant ratio is applied).

We hope that this representation is helpful. However, please do not hesitate to contact us if you require any additional information or wish to discuss any matters raised in this representation.

Yours faithfully



Duncan Chadwick
Managing Director

² Housing and Employment Needs Assessment (2022) jointly commissioned with Cherwell District Council

³ The Housing requirement as set out in the Oxford Local Plan 2040

⁴ <https://www.gov.uk/guidance/housing-supply-and-delivery#calculating>

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