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Date: 04/01/2024

Planning Policy Team
Oxford City Council

Via email – planningpolicy@oxford.gov.uk

Dear Sir/Madam

**OXFORD LOCAL PLAN 2040 PROPOSED SUBMISSION DRAFT (REGULATION 19)
CONSULTATION – RESPONSE ON BEHALF OF BRASENOSE COLLEGE**

This representation to Oxford City Council is made on behalf of Brasenose College ('the College') to the Oxford Local Plan 2040 Regulation 19 Consultation. Like the majority of Colleges, Brasenose College is an independent charity, but also a member of the Collegiate University of Oxford. The College manages its own academic estate within Oxford as well as other historic land holdings in the region and beyond, which provide the College its endowment that supports its charitable aims. This includes strategic land at Northfield in South Oxfordshire, which is being promoted on behalf of the College by L&Q Estates.

Brasenose interests align with those of several other Colleges and the University who individually and collectively are making representations in response to the Regulation 19 consultation process. However, the fixing of a spatial strategy is of such fundamental importance to the College that Brasenose wished to represent its views independently.

The College was founded in 1509 and like many other Colleges and Universities in the City, has contributed to the physical, educational and cultural landscape of the City ever since. The success of the City has advanced in-step with the success of its Universities, but the importance of education and learning to the historic development and future of the City does not appear to be recognised within the Vision. This may have led to a combination of policy choices that collectively, risk comprising the success of the collegiate University which in turn will negatively impact on the growth of the City and regional economy. The draft policies in the Oxford City Local Plan need to begin from a clearer position that it is important for Oxford to play its part in developing the UK as global leader in innovation in accordance with the National Planning Policy Framework (paragraph 85). National policy also requires Local Plans to be prepared positively, to be aspirational, but deliverable (para 16b) and make sufficient provision for all development (paragraph 20a). It is our contention that the draft Local Plan instead imposes policy of restraint in respect of the Collegiate University and that it fails to examine alternative, aspirational scenarios which could deliver for the City and wider economy.

We recognise the challenges facing the City Council in terms of joint working with other Oxfordshire Authorities under the soon-to-be replaced Duty to Cooperate, combined with a number of Plans all being on different timelines. However, this increases the need to look more closely at both the role and capacity of the City so the implications for surrounding Districts can be more clearly understood.

The concerns of the College are set out in further detail below.



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Policy S1: Spatial Strategy and Presumption in Favour of Sustainable Development

It is surprising that as major landowners and employers, there is no aspect of the strategy related to universities despite their significant impact on the City as described above. It fails to mention the impact of research funding and spinout activity that the University has and will have on the City. This omission reflects the general thrust of the Draft Plan as it unduly restrains and controls growth, rather than find a sustainable response to the challenges of growth. By way of an example, Policy H10 imposes a cap on the growth of both Universities, decreasing it in the University of Oxford's case, but does not find any new sites to support new student accommodation. At the same time, Policy C4 requires all new development for learning facilities to be justified and furthermore, that it meets a local need only. This is a contradiction to the success of Oxford as an 800 year old seat of learning.

Further detailed examples are provided below.

Policy H10: Linking new academic facilities with adequate provision of student accommodation.

Policy H10 seeks to restrict the development of any new academic facilities when the number of students living within non university-operated accommodation exceeds a prescribed cap. The cap for the University of Oxford is declining from 1,500 to 1,300, but no new sources of supply are identified. At the same time, restrictions are increasing: Policy H3 seeks affordable housing contributions from new purpose-built student accommodation and Policy H9 restricts potential new sites that might supply future accommodation.

Policy H9: Location of new student accommodation

Despite the potential of purpose-built student accommodation to impact positively on wider housing availability in the City through freeing up traditional housing stock, Policy H9 sets out a restrictive and limited list of locations suitable for student accommodation. It is the College's view that student accommodation should be more positively planned for, which in turn is supportive of the overall housing strategy for the City. Brasenose College would therefore encourage that the list of suitable locations for student accommodation is expanded to include 'along arterial routes' and that 'adjacent sites' are defined as being 'sites within a 15-minute walking distance of an existing campus/college'. Many Colleges own sites which are not available to the general housing market but may fail the 'adjacency' test. These sites should be free to come forward for student accommodation.

Policy C4: Protection, alteration and provision of learning and non-residential institutions

Policy C4 is unnecessary controlling and presents a threat to the future academic and research strategy of the Collegiate University. It is not clear why any justification for future academic and research development is required and in no way can a local need be guaranteed beyond that any such development in a global hub for learning is inherently desirable and necessary. Further clauses in the Policy require the Universities to justify why existing uses are no longer required and why new ones are important. This places the Local Planning Authority in control of the research and learning strategies being pursued by an institution, a level of control which is unjustified and inappropriate.

Policy G1: Protection of the Green Infrastructure

Policy G1 designates several collegiate quadrangles as 'Core Green Spaces', and in doing so imposes inappropriate and unnecessary constraint. Not only does their designation as a 'green network' mischaracterise them, but these spaces are already afforded suitable protection by heritage considerations and the setting of Listed Buildings. The designation mischaracterises their urban function and fails to

recognise how they often fulfil important operational requirements which could not be achieved if protected as Core Green Spaces. These are dynamic functional sites which should be open to potential development such as accommodating subterranean, top-lit spaces such as new libraries or book stores, study spaces, connections etc, as well as new pavilions. Indeed, the Changes in hard landscaping as well as biodiversity interventions underline their dynamic urban character. These exchanges have been successfully managed for many years through existing planning policies and protections and we see no justification for adding additional controls through Policy G1.

R2: Embodied carbon in the construction process

Whilst improving the retrofit and reuse of buildings is to be welcomed where possible, the current policy fails to take account of the complex requirements of academic and research institutions and make suitable exemptions. Planning policy at a national level requires policies to only support and encourage retrofitting and not mandating. The College takes the need to consider re-use of existing building stock seriously and can point to many successful examples of rehabilitating many collegiate buildings. The policy as drafted creates discretionary carbon budgeting which will not be resolved until the very end of a lengthy and costly planning process. Any retrofitting policies need to be clearly defined so matters of principle are not left to the discretion of the Planning Authority.

Policy HD8: Views and Building Heights and Policy HD9: Views and Building Heights

Policy HD8 is a recipe for conservatism and missed opportunity. There are many parts of Oxford which are less sensitive to increased height and it would be helpful if the evidence base was developed further to identify greater opportunities for height across the City to ensure the most efficient use of precious land. This is vital if both Universities are being asked to build more student accommodation with no new substantive opportunities identified, whilst other Districts are to be asked to accommodate unmet general housing need. In addition, Policy HD9 is not consistent with NPPF as it does not allow for the level of harm to historic significance to be assessed and then balanced against public benefit. Under the terms of the Policy, all levels of harm are unacceptable and cannot be approved which is not consistent with national policy. In addition, the approach goes against the tradition within the City of positively supporting innovative schemes which make best use of land and contribute positively to the skyline of the City.

These matters are raised in the spirit of dialogue, and we trust that they are useful. However, should you have any queries in relation to the above please do contact us.

Yours faithfully,

Chris Pattison

Regional Planning Lead, Planning