



**GERALDEVE**  
A NEWMARK COMPANY



Planning Policy Team  
Oxford City Council  
Town Hall  
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Oxford  
OX1 1BX

05 January 2024

**Our Ref:** [REDACTED]

**Oxford Local Plan 2040 – Regulation 19 Consultation  
Manor Place**

Dear Sir/Madam

We write on behalf of our client, Merton College Oxford ('Merton College'), in order to submit representations in respect of the Oxford Local Plan 2040 Proposed Submission Draft (Regulation 19) ('the Draft Plan'), this document will guide development within the city through the policies set out. We also recognise that this consultation offers stakeholders one of their final opportunities to provide comments on whether the Draft Plan meets the tests of soundness set out in paragraph 35 of the National Planning Policy Framework (NPPF).

Merton College has an interest in the land known as Manor Place and is a substantial landowner within the boundaries of Oxford City Council ('OCC'). This representation focusses on their landholdings at Manor Place, allocated under adopted policy SP45 and draft policy SPCW3.

While we welcome the minimum number of units allocated for the site, which is in line with adopted policy, we consider that the site has the potential to accommodate a significantly larger proportion of units given its inner-city location and proximity to campuses. GE suggest the minimum unit threshold is increased to 60 residential units (equivalent to c. 150 PBSA units) promote effective use of land in line with Section 11 of the NPPF (2023).

We welcome the introduction of proposed policy H3 which confirms that on-site affordable housing will not be required from Purpose Built Student Accommodation ("PBSA") developments where said development is either a redevelopment of an existing PBSA development owned by a university, or where it is to be delivered within an existing or proposed university campus.

We consider this approach would promote further PBSA developments to come forward to meet the significant demand identified, which would also assist in releasing conventional housing back to the market. However, we would need to have sight of, and review the definition for 'existing or proposed university or college campus site' to ensure it is not restrictive in its reach.

Yours faithfully

**Gerald Eve LLP**

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