



**Hearing Statement**  
**Respondent Reference: 243**  
**Lincoln College**

**EXAMINATION INTO THE OXFORD**  
**LOCAL PLAN 2036**

**November 2019**

Introduction

1. This statement is submitted to the Examination of Oxford's Local Plan 2036 on behalf of Lincoln College (the College).
2. This statement responds specifically to the questions raised in the document entitled "Examination into the Soundness of the Oxford Local Plan 2036 – Inspectors' Matters and Issues" issued by the Inspectors on 15<sup>th</sup> October 2019 in respect of Matter 6, so far as these matters affect the site proposed to be allocated under Policy SP44 (Lincoln College Sports Ground).

Word count: 1,062

## Matter 6D – Specific Site Allocations. Policy SP44 Lincoln College Sports

### Ground

The specific questions raised for consideration by the Inspectors at the Local Hearings are:

- a) Whether the allocation policy is positively worded enough to encourage the beneficial development of the site concerned and whether its wording allows for sufficient flexibility in the faces of future changes in circumstances; and
- b) Whether the Plan's approach towards the amount of development and the balance of land uses (including open space and sports provision) is sound?

#### Positivity and flexibility of wording

1. The College welcomes the acknowledgment of the site as being suitable for development through the allocation, however, national planning policy requires plans to positively seek opportunities to meet an area's development needs and to contain the flexibility required to adapt to rapid change (Paragraph 11, NPPF). Paragraph 81 of the NPPF requires planning policies to contain sufficient flexibility to accommodate needs that the plan does not anticipate.

2. Within this context, the wording of the proposed policy (*"Planning permission will be granted for residential development and public open space at Lincoln College Sports Ground. Planning permission will not be granted for any other uses."*) is considered **not** to be positively prepared and therefore inconsistent with the NPPF's objectives. The College notes the Inspector's view expressed in IC1C that the provision *"planning permission will not be granted for any other uses"* is incompatible with the NPPF and agree it must be removed from site allocation policies, including SP.44, if the Plan is to be considered sound.

3. In this instance we consider that there are site specific considerations which would justify allocating the site for residential development **and/or** for student accommodation.

4. We note that the Inspectors have already identified that the existing drafting of the Policy prevents the College from providing student accommodation on its own land

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and questioned the Council's justification for this along with the implications of this restriction on meeting the need for student accommodation (IC2).

5. The City Council's reasons for wishing to impose locational restrictions upon new student accommodation on unallocated sites under Policy H8 of the Draft Local Plan are clear from their response to Question 2 in the document OCC2 (Oxford City Council response to Second Set of Inspectors' initial questions and comments (IC.2)) (undated). This sets out justifications for the general locational strategy of new student accommodation, including:

- Moderation of intense demand for development which can restrict the availability of sites for market and affordable housing;
- The preservation of residential neighbourhoods, protecting their character and amenity;
- Avoiding the strain on capacity of local facilities and services;
- Ensuring sustainable locations for new student accommodation where cars are not relied upon (given that there are restrictions upon bringing cars into the City);
- Ensuring that student accommodation is located in parts of the City that give students a positive experience of studying in Oxford.

6. The Council's response (Paragraph 41.1 of document OCC2) contends with regard to Policy SP44 that "*Development of purpose-built student accommodation would be dominant within this area and would affect the character of the area as well as amenity of local residents*". We disagree with this assertion. The College's intention would most likely be to deliver postgraduate and fellows' accommodation in a quieter and more verdant environment away from the hubbub of the College's main City Centre campus. Such accommodation would be most likely to comprise self-contained units whose overall impact upon residential amenity would be less than that which is typically associated with undergraduate accommodation.

7. We consider that the allocation of this site for student accommodation (most likely graduate students or second year students to meet the College's needs) is wholly compatible with the objectives of the locational strategy posed by Policy H8. Firstly, is evident that the site is allocated for residential development in the current development plan, however it has failed to come forward to be developed. In terms of meeting future

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need for graduate accommodation, Lincoln College has limited land holdings in the City where this could be delivered.

8. Secondly, whilst the protection of the character and amenity of residential neighbourhoods remains an important objective, there is already a critical mass of postgraduate accommodation at Herbert Close (comprising around 40 flats) in a location that is well served by cycle routes, including the Barracks Lane route which passes the site, and pedestrian routes into the City. Bus stops are located within 200 metres of the site, with services travelling eastwards towards Cowley Centre and westwards towards the City Centre. The site is well located in relation to the Cowley Road, a principal thoroughfare to the City Centre, and a defined District Centre in its own right. While we acknowledge that access to the Cowley Road is generally via residential streets, there is already a quite significant degree of pedestrian and vehicular thoroughfare here associated with the Oxford Spires Academy as well as the allotments which residents are accustomed to, as well as the comings and goings of residents at Herbert Close. The net increase in activity associated with student accommodation on the site is not likely to be any more significant than if it were in general residential use. The size of the site also offers scope to provide a buffer between residential and student accommodation as a further safeguard against disruption to residents.

9. The Inspector's attention is also drawn to the proposed site allocation SP59 (Summertown House at Apsley Road). The site already comprises graduate accommodation off a residential road – the policy is permissive of additional student accommodation notwithstanding the broader residential context. Officers recognise its suitability for additional graduate accommodation. The same ought to apply to site allocation SP44.