



Oxford Local Plan 2036

Joint Statement of Common Ground: University of Oxford and Oxford City Council

Parties:

- Oxford City Council
- University of Oxford

Contents

Introduction	4
Background	4
Context	5
Key issues	5
Policy E1: Employment sites	6
Policy H1: The scale of new housing provision.	6
Background	6
Common Ground.....	7
Matters in Dispute	8
Policy H2: Delivering affordable homes	8
Background	8
Common Ground.....	9
Proposed Main Modification	9
Matters in Dispute	9
Policy H3: Employer-linked affordable housing	10
Background	10
Common Ground.....	10
Proposed Main Modification	11
Matters in Dispute	11
Policy H4: Mix of dwelling sizes	12
Common Ground.....	12
Proposed main modification.....	12
Policy H9: Linking the delivery of new/redeveloped and refurbished university academic facilities to the delivery of university provided residential accommodation.....	13
Common ground	13
Matters in Dispute	14
Policy RE1: Sustainable design and construction.....	14
Common ground	14
Policy G3: Green Belt	15
Matters in dispute.....	15
Policy DH2: Views and building heights	15
Common ground	15
Policy M3: Motor vehicle parking	15
Common ground	15
Policy SP1: Sites in the West End	16

Common ground	16
Proposed Main Modification	16
Policy SP 2: Osney Mead	16
Background	16
Common Ground.....	17
Proposed Main Modification	17
Policy SP6 Diamond Place and Ewert House, Summertown.....	19
Matters in dispute.....	19
Policy SP28: Park Farm, Marston	19
Common Ground.....	19
Matters in Dispute	19
Policy SP 32: Banbury Rd Site	20
Common Ground.....	20
Policy SP 35: Court Place Gardens	20
Background	20
Common Ground.....	21
Proposed Main Modification	21
Matters in dispute.....	21
Policy SP49: Old Power Station.....	22
Common ground	22
Policy SP53: Oxford University Press Sports Ground, Jordan Hill	22
Common Ground.....	22
Matters in Dispute	22
Policy SP 63: West Wellington Square	23
Common ground	23
SP Policies: "Planning permission will not be granted for any other uses" in policy wording	23
Matters in dispute	23
University of Oxford sites in housing trajectory	23
Common Ground.....	23

Introduction

- 1.1. This Statement of Common Ground (SoCG) is prepared in relation to the Oxford Local Plan 2036 (OLP).
- 1.2. It is prepared jointly by Oxford City Council (OCC) and the University of Oxford (the Parties).
- 1.3. The Statement is without prejudice to other matters of detail that the Parties may wish to raise during the examination.

Background

- 1.4. The Parties have a long history of regular communication and working together.
- 1.5. The University has made submissions to OCC at each stage through the preparation of the OLP.
- 1.6. In July 2016, the University submitted to OCC a questionnaire as a response to the First Steps Consultation on the draft OLP.
- 1.7. In March 2017, the University submitted to OCC draft representations in relation to the initial consultation on the draft OLP. Following approval by University Council, these were sent as formal representations to OCC in June 2017 and included a foreword by the Vice Chancellor, which stated:

“We are committed to being good neighbours, and to working in close collaboration with the City for the mutual benefit of Oxford and its communities. We welcome the opportunity provided by the Local Plan 2016-2036 to make a lasting and valuable contribution to discussions that will shape the future of Oxford City. In addition to increasing the contribution that we make to the City’s economic development, we are keen to explore how best to work together in addressing a number of other key areas, from the chronic need for affordable housing to further reducing our carbon footprint and encouraging the growth of prosperity across all sectors of society.”

- 1.8. In August 2017, the University responded to the Local Plan Preferred Options consultation (Regulation 18). The top three issues raised in the University’s response were:
 - i. The University is an Anchor Institution in the City which it considers justifies it being given substantial recognition in the Preferred Options.
 - ii. The University is very pleased with the recognition of the needs of major employers, such as the University, and the opportunity for them to provide intermediate housing for their lower paid staff.
 - iii. The University and Colleges have a large number of potential development sites, therefore the University requests that there should be a continuing dialogue with the City Council to finalise the sites to be allocated in the submission Local Plan over the coming months.
- 1.9. In December 2018, the University responded to the Proposed Submission Consultation on the Draft OLP 2036 (Regulation 20), lodging 16 representations in total (two of which were in support). The University was pleased with the enormous progress that had been made in 2018 following various discussions and meetings held with officers and elected members. It was stated in the submission:

“The draft Plan shows an understanding of the University and its ambitions, and the specific policies are particularly encouraging in view of the opportunities they now present to the

University with regards to residential development in particular for its staff at an affordable rent.”

1.10. There are also regular monthly liaison meetings held between the Parties which are set up to discuss all planning matters which arise between the two Parties.

Context

1.11. The Parties agree that the objectives of the Local Plan and the University of Oxford share many commonalities and that the University of Oxford acts to support many of these objectives.

- The University is an anchor Institution in the City being part of the fabric of the City and contributing to its economic health.
- The University is a key player in the knowledge and research.
- A substantial proportion of the City’s history and urban environment assets are in the care of the University and Colleges.
- The University takes seriously its responsibility to the built environment and managing its environmental impacts. For example the University is at the forefront of promoting more sustainable travel, both in terms of research and changing behaviours and the University shares the City Council’s low carbon ambitions.
- The University supports the objectives to provide housing. This includes meeting the requirements of those in need and ensuring there is an appropriate mix of housing types to meet the needs of existing and future residents as far as possible. The University is keen to play its part towards this need by providing housing for its students and staff.

Key issues

Sustainable economic growth

1.12. The Parties agree that the University is important to the economic health and wider life of the City.

1.13. The academic study, research and innovation at the University of Oxford is the tip of a pyramid that drives the local Oxford, County and Regional economies. A study in 2017 of the economic impact of the University of Oxford (the University, its Colleges, the Oxford University Press and the other associated organisations such as its Science Parks) has estimated that in 2014/15 the University of Oxford contributed £5.8 billion Gross Value Added (GVA) to the UK economy, of which £2.0 billion GVA was to Oxford City, supporting an estimated 30,000 jobs. This study, which is a significant piece of analysis based on the most up-to-date information available, considered how the activities of the Collegiate University of Oxford and its related organisations have contributed to the economy through their activities in 2014/15. It considered the quantifiable role that the University has on the economy through its core activities, students, graduates, business interaction, science parks, impacts on the tourism sector and its research. The economic contribution was measured in terms of GVA, revenues less cost of revenues, and the number of jobs supported.

1.14. This means that the University’s contribution of £2.0 billion GVA represents about 30% of Oxford’s total estimated GVA of £6.75 billion. This confirms that the Collegiate University has a remarkable place in the City.

1.15. The Parties agree that Oxford should continue to grow and develop, with a strong economy contributing to advancements in learning and innovation, locally, nationally and globally.

- 1.16. The Parties consider that such growth will be beneficial to local people, through the extensive contributions the University makes to the culture, heritage, environment, infrastructure and life of the City.
- 1.17. In the search for growth, policy makers from all political parties are increasingly recognising that cities are vital to the economic future of the country. The OLP consultation acknowledged that standing-still is not an option for Oxford, neither is it an option for the University. Nevertheless, such growth does not mean there need be adverse implications for the local community or its local authority neighbours simply because Oxford is such a vibrant City. Growth through the development of an advanced knowledge economy has huge potential for driving the type of sustainable development to which many cities aspire.
- 1.18. Oxford is already part of a knowledge intensive region that encompasses London and Cambridge in what has been called, by some, the 'Golden Triangle'. The role and potential of Oxford and Oxfordshire has been further analysed by the National Infrastructure Commission in its report "Partnering for Prosperity". This report sets down ambitious proposals and recommendations to maximise the potential of the Oxford to Cambridge Arc as "a connected, knowledge-intensive cluster that competes on a global stage, protecting the area's high quality environment and securing the homes and jobs that the area needs". The Commission's central finding is that rates of house building will need to double if the Arc is to achieve its economic potential. The Government has given its support for the Oxford – Cambridge Arc most recently with the publication on 12 March 2019 of the joint declaration between the Government and local partners.

Policy E1: Employment sites

- 2.1. The Parties agree that there should be a balance between competing land uses in the City, and that as part of this balance key employment sites should be retained in this use and protected from being 'lost' to housing or other non-employment uses.
- 2.2. The Parties agree that the appropriate planning approach is to permit diversification on employment sites to other uses on the basis that the level of employment is not diminished.
- 2.3. This is the approach that is proposed for Policy SP2 Osney Mead where development of an Innovation Quarter is encouraged.

Policy H1: The scale of new housing provision.

Background

- 3.1. This policy sets out OCC's proposals for a minimum provision of 8,620 additional homes between 2016 and 2036. This implies that there might be a significant shortfall in housing provision compared with the assessed housing need for Oxford. The Oxfordshire Strategic Housing Market Assessment (SHMA) 2014 was published in April 2014. It provided an objective assessment of housing need for Oxford of 28,000 homes (mid-point) from 2011 to 2031. The Oxfordshire Growth Board (OGB) agreed in November 2015 upon a 'working assumption' that the quantum of this Oxford' need (28,000) that could not be provided within the city's administrative boundary is 15,000 homes (now agreed at 14,850 following a strategic housing

site analysis). The subsequent apportionment of this unmet need to the other four Oxfordshire districts, was agreed by OGB in September 2016. With Oxford's housing need assessed as being 28,000 homes (2011-2031) this means approximately 13,000 homes should be provided by the City Council's Local Plan within Oxford's administrative boundary. The Oxfordshire Housing and Growth Deal Plan assumes that the capacity of Oxford is 10,000 dwellings (2011-2031).

- 3.2. To calculate Oxford's housing need to 2036, the City Council commissioned an addendum-style report to supplement the 2014 SHMA to roll-forward to 2036 Oxford's OAN calculation. The 2018 SHMA roll-forward has used the same methodology as the previous SHMA, but has used the most up-to-date household forecasts and has re-calculated the implications of economic growth. The SHMA roll-forward has reflected current and future demographic trends and market signals, which reflect Oxford's particularly young and dynamic population demographic. The conclusion of the SHMA roll-forward is that Oxford has a housing need of 1,400 dwellings per annum to 2036, giving a total level of housing need to 2036 of 28,000 (1,400 x 20).
- 3.3. Since the submission of the OLP in March 2019, the Housing and Economic Land Availability Assessment (HELAA) has been updated in response to completions and commitments data to 31 March 2019. As a result of these updates the capacity based housing requirement for Oxford City 2016-2036 has been established to be 10,884.
- 3.4. It is important to the vitality of the University that the full Oxford housing need of 28,000 homes is delivered over the next 20 years. This is because any shortfall in housing delivery risks the housing crisis persisting along with the associated adverse social and economic consequences. As explained in the Assessing and Meeting Housing Need Background Paper, OCC hopes that its new policies on building heights, increased density, open spaces, parking levels will assist to maximise the number of homes eventually built through the plan period. Both parties agree that many sites in the city are complex and the University agrees with the City Council's suggested modification in response to the Inspectors' initial question 3 that Policy H1 should include a stepped trajectory.
- 3.5. The University is aware that the OLP has attracted a lot of objections to Policy H1 especially from those who consider too many and the wrong housing sites have been allocated. In this respect the University supports all endeavours by OCC to increase the certainty of achieving its share of the housing need agreed by the OGB. The University hopes that its voice will be recognised as an important counter balance to those arguing against the housing allocations, especially those allocations that involve the release of suitable land from the Green Belt within the City's administrative area.

Common Ground

- 3.6. The Parties agree that because of the importance of providing new housing to meet Oxford's needs and the constraints on land supply in Oxford, it is appropriate to make an extensive search for suitable developable land including assessing the potential contribution from releasing suitable land currently in the Green Belt.
- 3.7. The Parties agree that in the light of the updated HELAA (PSD.2) Policy H1 should be modified as indicated in OCC's response to the Inspectors' initial questions and comments, Question 3 (OCC.1C).

Matters in Dispute

University of Oxford comments

- 3.8. The University of Oxford has lodged an objection requesting that Policy H1 be improved by including a clear and substantial account of the measures that will be undertaken and by whom to ensure that provision is made for the full housing need for Oxford of 28,000 new homes to be met. The University consider that an appropriate reference in the accompanying text to Policy H1 to explain the measures to be undertaken to achieve the full housing need for Oxford would overcome some of the University's concerns in this objection.

Oxford City Council Comments

- 3.9. OCC considers that such a reference is unnecessary. The City Council's view is that the Plan should always be read as a whole and Policies are designed to ensure appropriate delivery of housing so far as that is in control of the planning system. There is no need to note all the policies relevant to achieving this in Policy H1. Furthermore, many measures will be outside of the planning system or not controlled directly by planning policy and it would not be appropriate to state these in a Local Plan policy.
- 3.10. The City Council consider that paragraph 3.3 of the draft Oxford Local Plan 2036 already explains the measures to be undertaken to achieve housing need in Oxford and 3.10 to 3.12 explains the measures associated with unmet housing need.

Policy H2: Delivering affordable homes

Background

- 4.1. In 2017 the University of Oxford agreed and published its Strategic Plan 2018 -2023 which sets out a framework of priorities for the University, its divisions and departments. The Strategic Plan outlines a strategy for growth, and includes a number of priorities that are relevant to the OLP. The Strategic Plan was submitted as part of the University's formal response to the Proposed Submission Draft Local Plan 2036.
- 4.2. The Strategic Plan articulates an ambition, by 2023, to increase the intake of postgraduate research students, who are vital to our research work, by up to 400 a year (priority 5), and to increase the intake of postgraduate taught students by 450 a year (also priority 5), while never compromising on the quality of the students. The plan also articulates an ambition to increase, by 2023, the undergraduate intake by 200 a year (priority 4), with a focus on strategically important subjects such as computer science, engineering, biomedical science, and joint degrees in economics.
- 4.3. The University is fully aware of the strains the growth in graduate student numbers has already placed on many of the colleges and on the rental market in the city. For this reason it commits to starting the construction of 1,000 additional graduate student rooms including the establishment of at least one new graduate college (priority 7) within the next five years.
- 4.4. The University supports Policy H8: Provision of new student accommodation, in so far as it enables it and the Oxford Colleges to build new student accommodation on a limited range of locations as specified in the OLP.

Common Ground

- 4.5. The Parties agree that, in the light of the Inspectors' view on Policy H2 criterion a ii, as well as the introduction of the national ratio to apply to student accommodation, a change should also be made to the threshold in criterion b of Policy H2:

Proposed Main Modification

- 4.6. For clarity, the Parties agree that the following main modifications to Policy H2 b), set out in track changes below would ensure the policy is in line with the overall approach and therefore ensure its effectiveness.

Policy H2: Delivering affordable housing (part)

b) For new student accommodation of 25 or more student units (or 10 or more self-contained student units), a financial contribution should be secured towards delivering affordable housing elsewhere in Oxford. The contribution will be calculated using the formula in Appendix 3.2. Alternatively, the affordable housing contribution can be provided on-site where both the City Council and the applicant agree that this provision is appropriate. For mixed-use developments of student accommodation with general housing a pro-rata approach will be used to determine whether a contribution is required, and how much this should be.

Accompanying Text (part)

New para 3.18 (a)

A key objective of the Local Plan is to ensure that new residential development contributes to a balance of housing types and tenures, which in turn contribute to mixed and balanced communities. New student accommodation is often proposed on sites that could otherwise be developed for housing and which would therefore include affordable homes as part of a wider tenure mix. The policy will apply to all proposals for providing 25 or more student units (or 10 or more self-contained student units.)

To prevent new student accommodation constructed as self-contained Use Class C3 dwelling houses being rented or sold as market housing the City Council will consider the use of S106 agreements to prevent the student accommodation being rented or sold in this way.

Matters in Dispute

University of Oxford comments

- 4.7. The University of Oxford considers that the Local Plan is unsound because in Policy H2 b) there are no exceptions to the requirement that new student accommodation should provide a financial contribution towards delivering affordable housing elsewhere in Oxford. The very sensible exceptions in the adopted Sites and Housing Plan Policy HP6 have not been brought forward into the new OLP. The University has submitted a Further Statement in relation to Matters 4: Housing Delivery and 5: Housing for particular groups, which invites the Inspectors to consider a limited number of exceptions in Policy H2 as a Modification.

Oxford City Council comments

- 4.8. The City Council continues to consider that these exceptions should not be included within Policy H2. We appreciate it is the position of the University is that some University campuses and sites with existing student accommodation may be unlikely for operational reasons to be

brought forward for housing but we do not consider this to be the same as not being suitable or capable of accommodating housing, nor irrespective of such suitability or capability, does this provide a justification for policy H2 not being engaged. In any event it is likely that any site that comes forward for student accommodation could also accommodate housing (whether general or for more specific occupiers) and therefore attract a requirement for affordable housing in accordance with H2. We note that the University has provided further detail to support their position in Matter statement 4/5. The City Council has not at this point provided a detailed response about H2 (b) as a matter statement because it was not one of the questions asked.

Policy H3: Employer-linked affordable housing

Background

- 5.1. The University of Oxford is pleased with the recognition in the OLP of the needs of major employers in the City and the significant contribution these can make to meeting housing needs, especially with the opportunity for them to provide affordable housing for their lower paid staff. The University welcomes the opportunity to provide 100% affordable housing for rent because in Policy H3 it explains that “Where this policy is applied the standard affordable housing requirements of Policy H2 will not apply”. All groups of staff contribute to the accommodation needs of the University and who, in looking to find accommodation locally, form part of the overall Oxford need.
- 5.2. The University is pleased the planning approach has moved away from using a key worker housing approach to one that gives priority to affordable homes for rent instead.

Common Ground

- 5.3. The Parties agree that employer-linked affordable housing, also referred to by the University as subsidised staff housing, is affordable housing, to be provided on-site and wholly in accord with the definition of “Affordable housing for rent” in the NPPF 2019 glossary.
- 5.4. The Parties agree that the policy should set out controls to guide the implementation of the policy because for the policy to be effective, it needs to work over its lifetime and consider a number of scenarios. The Parties agree that the policy is clear about the controls the City Council wish to use through the inclusion of the requirements that:
 - “Planning Permission will be granted on specific sites”
 - “On these sites an affordable housing approach will need to be agreed with the Council...”
 - Five criteria (a–e) must be met to apply this policy including “a) the employer has an agreed affordable housing approach in place setting out access criteria and eligibility, rent policy and rent levels, approved by the City Council and reviewed for compliance every five years.”
- 5.5. Policy H9 (Linking the delivery of new/redeveloped and refurbished university academic facilities to the delivery of university provided residential accommodation) has recognised that Post Graduate Research Students (PGRs) should not be covered by that Policy because they could be viewed as employees of the University (Paragraph 3.43 on page 48). The Parties agree that there may be instances that PGRs can demonstrate that they are employees of the University in need of employer linked affordable housing. However, there is dispute about how this should be acknowledged as picked up below.

- 5.6. These proposed changes are considered to be a main modification to the OLP. If the Inspectors consider this proposed modification to address the soundness issue then this would resolve the objection from the University of Oxford on this matter.

Proposed Main Modification

- 5.7. For clarity, the Parties agree that the following main modifications to Policy H3, set out in track changes below would ensure the policy is in line with the overall approach and therefore ensure its effectiveness.

Policy H3: Employer-linked affordable housing

Planning permission will be granted on specific sites (as listed in Appendix 3.4) for affordable housing for rent. On these sites an affordable housing approach will need to be agreed with the Council setting out how the proposed affordable homes will be developed and managed by the employers (or their development partners on their behalf) to meet the housing needs of their employees. Where this policy is applied the standard affordable housing requirements of Policy H2 will not apply, except to any market housing element on the site.

All the following criteria must be met to apply this policy:

- a) the employer has an agreed affordable housing approach in place setting out access criteria and eligibility, rent policy and rent levels, approved by the City Council and reviewed for compliance every five years; and**
- b) 100% of the housing should be available to be occupied by those employees who meet the requirements of the affordable housing approach agreed with the council and be available in perpetuity; and**
- c) the occupation of such housing will be limited to households where at least one member works for the employer linked to the site (for the duration of their employment). This also applies to social care workers who work for but are not employed directly by Oxfordshire County Council and to some NHS staff.**
- d) an occupancy register should be kept and made available for inspection by the City Council at any time; and**
- e) planning applications must be accompanied by a detailed explanation and justification of the approach proposed and the mechanisms for securing the requirements of this policy.**

Matters in Dispute

University of Oxford comments

- 5.8. The University is clear that this new University staff accommodation will significantly reduce the existing pressure on the local private rented sector exerted by its staff competing with other young professionals in the sector to the benefit of the City. Allowing the University to build staff housing within the City will reduce traffic congestion, improve air quality and reduce pressure on the highway network as more of University staff will be within walking and cycling distance of their workplaces.
- 5.9. The University of Oxford lodged an objection to the inclusion of the phrase “except to any market housing element on the site” in the Policy which signals that the standard affordable housing requirements of Policy H2 would apply to any such market housing. The University considers that the Policy should not preclude up to 50% market housing being permitted as long as at least 50% affordable housing is provided, potentially entirely as employer-linked affordable housing.

- 5.10. The University consider that reference to Post Graduate Research Students should be directly referenced in criterion c so that the Policy is aligned with Policy H9.
- 5.11. The University lodged an objection to the requirement in the Policy for there to be a legal agreement and what such an agreement will be used to control. The University notes that there is no such statement in Local Plan Policy H2, delivery of affordable housing. The University has submitted a Further Statement in relation to Matter 5: Housing for particular groups which explains that in the light of the controls already listed in the Policy's criteria a-e there is nothing to be gained by including the section about a legal agreement and what it will be used to secure.
- 5.12. Nevertheless, the University is aware that OCC, in a Further Statement, has proposed some Modifications to criteria f) and g). If these are agreed by the Inspectors it would overcome some of the University's concerns.

Oxford City Council comments

- 5.13. The City Council's view is that it would not be sound to add specific reference to Post graduate Research students as being considered appropriate for Employer Linked Affordable Housing in criterion c of the policy. This is because it would need to be demonstrated in the specific case that the PGRs were employees. It is important to the City Council that Employer Linked Affordable Housing is for those employees of the University who cannot access the housing market and would not be eligible for student accommodation. It is important that this does not become quasi student accommodation. Furthermore, the City Council does not agree that market housing could be delivered with 50% employer-linked housing rather than the affordable housing requirements set out in Policy H2. If market housing is being delivered there is no reason why that element of the scheme should not comply with Policy H2.
- 5.14. The City Council's view is that, because this is a wholly new approach, it is useful to set out in the policy the key considerations that will be covered in a legal agreement, and these are needed to ensure the policy is not circumvented to avoid delivery of affordable housing. Further details will clearly need to be negotiated as part of each individual legal agreement.

Policy H4: Mix of dwelling sizes

Common Ground

- 6.1. The University of Oxford made representations suggesting that Policy H4 should not apply to homes delivered under Policy H3: Employer-linked affordable housing. The City Council had not intended that Policy H4 should apply to Policy H3 but agree that this was not made explicit enough. The parties agree that the following modification to paragraph 3.26 would resolve this issue.

Proposed main modification

- 6.2. Add to the end of paragraph 3.26 'This mix does not apply to homes delivered under Policy H3.

Policy H9: Linking the delivery of new/redeveloped and refurbished university academic facilities to the delivery of university provided residential accommodation

Common ground

- 7.1. The University of Oxford together with the Colleges take extensive steps to build new and refurbish existing student accommodation so as to reduce the impact of students on the general housing stock in Oxford. At the last count reported to OCC for its Annual Monitoring Report 2018-2019, at 1 December 2018 there were 18,112 full-time students with accommodation requirements. There were 15,409 accommodation places provided across the Collegiate University. This left a total of 2,703 students living outside of University provided accommodation in Oxford. In addition there were also 751 student accommodation places under construction across the Collegiate University and extant planning permissions for a further 385 student accommodation places.
- 7.2. The University and Colleges have plans and strategies to provide new undergraduate and graduate accommodation so as to keep pace with the growth in student numbers, especially graduates.
- 7.3. Policy H9 states that the number of full-time taught course students living in Oxford in non-university - provided accommodation should not exceed 2,500 at the time of an academic application. This threshold will be reduced to 1,500 at 01 April 2022. The Policy recognises that:

“Student teachers, medical students and post-graduate research students (who could also be viewed as employees of the university) are amongst those categories of students not covered by the policy. These students help support key economic sectors and services in Oxford, might be working on placements outside of the city for much of their course (for example teaching and nursing students) and have very different accommodation needs” (paragraph 3.34).
- 7.4. The University agrees that it is appropriate in the Local Plan to revise adopted Policy CS25 in the Core Strategy which specifies a 3,000 student threshold (this is for all students: undergraduate and graduates both on taught course and research students).
- 7.5. It is pleased that OCC has agreed with its case that for post graduate research students, Oxford is their home throughout the year and often for a number of years, taking part in local life, so their life style is very comparable to that of other people living in the local community.
- 7.6. The same count as reported above indicated that, in rounded numbers, at December 2018 there were (unadjusted) 24,289 students at the University of which 9,548 were post graduate research students. The total number, once adjusted by excluding certain groups of student in agreement with OCC, leaves 14,195 students (undergraduates and post graduates on taught courses) with a requirement for accommodation. The Colleges and the University provided accommodation places in December 2018 for 13,228 students on full time taught courses. This indicates that a residual 967 full-time taught course students (undergraduate and graduates on taught courses) are living in 2018 in Oxford in non-university provided accommodation.
- 7.7. Once the University’s current plans for an increase in graduates and provision of new graduate accommodation are taken into account, it confirms that it should be able to keep within the

thresholds set out in Policy H9. It is aware that if the threshold is exceeded this has the potential to impact on its future planning applications for new academic floor space.

Matters in Dispute

University of Oxford comment

7.8. Beyond 2023 the pace of growth of both post-graduate taught (PGT) and post graduate research (PGR) student numbers might increase significantly. So its agreement to the thresholds in Policy H9 should not be taken to imply that it may not need to build post-graduate accommodation for both PGTs and PGRs on a greater range of sites than those allocated in the Local Plan. Hence its request under a number of SP policies for the option to build student accommodation in order to remain within the thresholds in H9. The University has submitted a Further Statement in relation to Matters 4: Housing Delivery and 5: Housing for particular groups, which comments on the inter-relationship between Policies E2, H8 and H9.

Oxford City Council comments

7.9. The City Council considers that enough sites are available to the University within the H9 locations to enable them to continue to meet the threshold set in H9. This reasoning is set out in OCC.2 and Matter Statement 5. At Regulation 19 the University expressed support of Policy H9 and it is not suggesting a change to the threshold. The City Council does not consider it needs to make exceptions to Policy H9 for specific sites.

Policy RE1: Sustainable design and construction

Common ground

- 8.1. The University of Oxford supports this policy. It has moved itself to the Passivhaus approach to designing sustainable buildings.
- 8.2. In the face of an escalating global climate crisis, the University has created an ambitious new carbon target - instead of the previous goal of cutting emissions by 33% by 2021, it is now committed to reducing them 50% from their peak in 2010 by 2030.
- 8.3. As a world, we face a growing threat of irreversible damage from a changing climate and urgently need to reduce emissions. The University's new target is based on years of practical experience of what is possible, and the University is confident it can meet the challenge. This whole area of energy efficient design and construction is complex and the University's academic research within this field is moving forward at a significant pace.
- 8.4. The University supports OCC and its policies in the Local Plan that take seriously climate change and the steps it is taking to reduce carbon emission. The Parties are in agreement over Policy RE1.

Policy G3: Green Belt

Matters in dispute

University of Oxford comments

9.1. The University of Oxford has lodged an objection seeking a minor and non-controversial request that an historic anomaly to the Green Belt (GB) boundary at the Botanic Gardens, High Street, is corrected. The GB boundary does not go around the Botanic Gardens which has a boundary that extends up to the banks of the Cherwell and Christ Church Meadow. Since the City Council considered it appropriate to adjust its City Centre Boundary in the LP to correctly encompass the whole of the Botanic Gardens, the University considers that it should also have corrected the historic anomaly to the GB at this location at the same time.

Oxford City Council comments

9.2. OCC disagree. It did not include in the LP work programme any assessment to correct historic anomalies to the city's GB boundary, and without a Green Belt assessment it is premature to assume that the boundary in this location is an 'anomaly'. Its only GB project was to assess the potential contribution from releasing suitable land currently in the Green Belt for residential use. The City Council does not see what exceptional circumstances may exist to support a change to the Green Belt in this location.

Policy DH2: Views and building heights

Common ground

- 10.1. The University of Oxford agrees that the Local Plan should continue to define the Oxford view cones and a high building restraint area.
- 10.2. The University supports Policy DH2 which proposes a more nuanced or sophisticated approach, to the adopted Policies HE9 and HE10 in the Local Plan 2001, to controlling the heights of new development. The assessment involves an extensive set of criteria to be demonstrated by the proponents of development and their experts. OCC now has well-established design guidance, the Heritage Plan, the Oxford View Cones Assessment and the support of the Oxford Design Review Panel. So, the University considers that the OCC can feel confident in its ability to operate such a more nuanced and criteria based policy to assess the impact of new building heights. The Parties are in agreement over Policy DH2.

Policy M3: Motor vehicle parking

Common ground

- 11.1. The University of Oxford supports this policy and OCC's intention to limit the opportunities for parking within the city in order to help to reduce car use leading to reductions in air pollution, congestion and the creation of a more attractive environment for walking and cyclists. It agrees with the argument that in reducing the availability of public and private parking there will be fewer car trips as people shift mode to more sustainable forms of transport. As OCC have explained in the OLP, parking across the city is not an efficient use of land, a key consideration in Oxford, where land is so constrained.
- 11.2. The University is supportive of promoting alternative non-car modes of transport, in particular of maximising the opportunities to improve access for cycling and walking. It already promotes

low or zero car developments. Low levels of parking are not a problem for the University but an opportunity.

- 11.3. The Parties are in agreement over Policy M3 and the revisions the City Council has proposed to it in their responses to the Inspectors' initial questions.

Policy SP1: Sites in the West End

Common ground

- 12.1. The University of Oxford has lodged an objection requesting that a reciprocal reference is made explicitly in the Policy to a new bridge linking the Oxpens site with the other side of the Thames. As drafted Policy SP1 only opaquely makes reference to "enhancing connectivity to Osney Mead". The context is explained below in the section on Policy SP2.
- 12.2. Both parties agree that the meaning of SP1 could be made more explicit and that the following Modification would ensure the effectiveness of Policy SP1.

Proposed Main Modification

- 12.3. For clarity, the Parties agree that the following main modifications to Policy SP1, set out in track changes below would ensure the policy is in line with the overall approach and therefore ensure its effectiveness.

Policy SP1: Sites in the West End

...Planning permission will only be granted for development on Oxpens where it enhances Oxpens Field to create a high quality open space, includes new high quality and well-located public realm, creates an active frontage along Oxpens Road, enhances connectivity to Osney Mead including futureproofing the proposals so they do not prevent the landing of a foot/cycle bridge across the Thames and is in accordance with the Oxpens SPD...

Policy SP 2: Osney Mead

Background

- 13.1. The University of Oxford has prepared a draft masterplan for Osney Mead which promotes the regeneration of the whole site and aims to provide increased opportunities for research, employment, homes and supporting uses, and better pedestrian and cycle connections to the city centre and surrounding areas. It envisages a transformation of Osney Mead into an Innovation Quarter with a combination of live/work, research and study activities in the same area. The Quarter would be designed as a denser urban and pleasant waterside environment for the City with new publicly accessible outdoor spaces and improved landscape quality.

- 13.2. The University, in its representation to the OLP, has indicated that it is supportive of Policy SP 2 and the encouragement for the development of an Innovation Quarter at Osney Mead. The University is willing to prepare a revised masterplan for Osney Mead prior to any development. The scope of the masterplan will be limited by the nature of the mixed landownerships of the area and the extent of progress with the Oxford Flood Alleviation Scheme.
- 13.3. The University agrees that there should be a new pedestrian and cycle bridge linking the site with the other side of the river. However, this is a costly piece of infrastructure and it is not clear when or if it will be possible for it to be delivered. The way that this requirement is expressed so simply in the Policy is of concern to the University.

Common Ground

- 13.4. The Parties agree that the OLP should confirm that the revised masterplan for the site should consider in greater detail how and when the bridge might be delivered.
- 13.5. This proposed change is considered to be a main modification to the OLP 2036. If the Inspectors consider this proposed modification to address the soundness issue then this would resolve the objection from the University of Oxford on this matter.
- 13.6. The University supports the main modification to SP2 already proposed by OCC in a Statement of Common Ground with the Environment Agency relating to a Comprehensive Flood Risk Management Plan MM8 page 135 Policy SP2. The University also supports the minor modification already proposed by OCC to the supporting text of this policy (paragraph 9.25) that refers to emergency planning.
- 13.7. The University supports the minor modification already proposed by OCC. MiM100 page 135 Policy SP2.

Proposed Main Modification

- 13.8. For clarity, the Parties agree that the following main modifications to Policy SP2, set out in track changes below would ensure the policy is in line with the overall approach and therefore ensure its effectiveness.

Policy SP2: Osney Mead

Planning permission will be granted for a mixed use development that includes employment uses, academic uses, student accommodation, employer-linked housing and market housing. The development of an innovation quarter is encouraged. Planning permission will not be granted for any other uses other than ancillary uses to support an innovation quarter¹.

The site would only be suitable for academic institutional uses provided that it can be demonstrated that there are no more than the threshold number of students of the relevant university living outside of university provided student accommodation (in accordance with Policy H9).

¹ The University of Oxford has lodged an objection to this phrase. See Matters in Dispute on page 20

Planning permission will not be granted for development that prejudices the comprehensive development of the whole site. A masterplan approved by the City Council should be developed prior to any development, and all development should comply with the masterplan. New high-quality public open space should be created on the site with a reduction in car parking spaces. Footpaths to and through the site should be provided and existing routes enhanced. The masterplan should consider in greater detail how and when a new pedestrian and cycle bridge will be delivered linking this site with the other side of the river. ~~should be created.~~

Development should be designed to enhance the relationship and connection between the site and the river and to enhance physical and visual permeability of the site. Development should be designed to have a positive impact on views, particularly the view from Hinksey Hill to the historic core.

A planning application must be accompanied by a site-specific flood risk assessment and development should incorporate any mitigation measures.

A Comprehensive Flood Risk Management Strategy should be produced in support of the Flood Risk Assessment for this site. The Flood Risk Management Strategy should be developed in consultation with Category 1 organisations as defined by the Civil Contingencies Act 2004.

Accompanying text changes

9.22 Although currently separated from it, a new link across the river should be provided to integrate the site with the city centre. The masterplan for the site should consider in greater detail how and when the pedestrian and cycle bridge can be delivered, recognising that its delivery will require the landowners on the both sides of the river Thames to accommodate its physical provision within their masterplans. The pedestrian and cycle bridge will also connect the site with the new student development next to Oxpens. Therefore, if the connection is in place, the site should begin to function as an extension of the city centre. It would therefore be suitable for residential use that may include student accommodation and employer-linked housing or market housing. Delivery of housing should support and complement the employment function of the site.

9.25 It is recognised that the FRA may not be able to demonstrate a dry risk/ low hazard rating route to dry land. Therefore in order to achieve safe access and/ or egress for this site to satisfy the Exception Test there may be a greater reliance on on-site measures, emergency planning, and evacuation procedures, alongside offsite mitigation, to ensure that it is safe for its lifetime taking account of the vulnerability of its users without increasing the burden on emergency services. Development should be made safe by mitigating the potential impacts of development through design and resilient construction measures. It should be designed and constructed such that the health and welfare of people is appropriately managed.

Policy SP6 Diamond Place and Ewert House, Summertown

Matters in dispute

University of Oxford comments

14.1. The University of Oxford has lodged an objection because it considers that the list of permitted uses should include employer-linked affordable housing. The University considers that it should have the opportunity to provide subsidised staff accommodation alongside that for student accommodation on its land at Ewert House. The Policy for this mixed-use development site already includes residential as a suitable use. The University considers that the site is well located, within the Summertown district centre and with good bus and cycle links to the University's core academic buildings. This would ensure that the new housing would be occupied by 'essential workers of the city' and post graduates to help alleviate the problems of the city's housing needs.

Oxford City Council comments

14.2. OCC does not consider that a change is needed to the policy to list employer linked affordable housing as an acceptable use. This is because that would already be allowed by the employer-linked affordable housing policy (H3) if academic use is to remain on the site. If academic use is not to remain on the site then the City Council does not consider that the site should be used for employer-linked affordable housing. The intention of the policy is that it applies only in very specific and limited circumstances. The policy does not preclude the University from retaining the market element of a scheme for their own purposes and managing the stock as private rented dwellings for staff.

Policy SP28: Park Farm, Marston

Common Ground

15.1. OCC, as part of its assessment of the potential contribution from releasing suitable land currently in the Green Belt, has allocated this site for residential use. The Parties agree that this is a suitable allocation for the site.

Matters in Dispute

University of Oxford comments

15.2. The University of Oxford has lodged an objection because it considers that the list of permitted uses should include employer-linked affordable housing and student accommodation. The University considers that this site at Park Farm is very suitable to provide staff and graduate student accommodation. The University considers that the site is well located, within a vibrant local community, on a good radial public transport bus corridor and within very easy cycling distance of the University's science area and other core academic buildings. This would ensure that the new housing would be occupied by 'essential workers of the city' and post graduates to help alleviate the problems of the city's housing needs.

Oxford City Council comments

15.3. OCC does not accept that this change is necessary to make the plan sound. The site is outside of the limited types of sites where employer-linked affordable housing may be considered; extending this definition would be at the expense of delivery of on-site social rented housing.

Furthermore, the site is not necessary to enable the University to meet its student threshold set by Policy H9 and it is not in a location listed as suitable for student accommodation in Policy H8. The City Council does not consider the site is a suitable location for student accommodation. The site is in Green Belt currently and the exceptional circumstances case was not on the basis of need for student accommodation or employer-linked affordable housing. The policy does not preclude the University from retaining the market element of a scheme for their own purposes and managing the stock as private rented dwellings for staff.

Policy SP 32: Banbury Rd Site.

Common Ground

- 16.1. The University of Oxford and Hertford College are considering the development of a scheme covering a wider area than that shown on the Policies Map at the Regulation 19 consultation. The current site boundary was brought forward from the Sites and Housing Plan but the Policies Map should reflect the area that the University and Hertford College are drawing up plans for. The Parties agree that it is not necessary that the wording of the policy be amended, although the site size should be amended in the information box (and the landowner if this information is to be retained in the information boxes).
- 16.2. The City Council altered the draft Policies Map prior to submitting the OLP to the Secretary of State to show the larger site area and the information box relating to this site was amended to reflect this. This satisfies the University's Regulation 19 objection.

Policy SP 35: Court Place Gardens

Background

- 17.1. The University of Oxford is pleased the City Council has identified in Policy SP 35 that the University can provide graduate student accommodation, employer-linked affordable housing or a mix of both at Court Place Gardens. The site currently contains 36 units of graduate student accommodation and the University has firm plans to redevelop the site at a greater density to make better use of the land.
- 17.2. The University's current proposal is for a development of between 85 to 100 units of Use Class C3 self-contained accommodation. This could be for a mixed scheme of both employer-linked affordable housing for staff and for post graduate students. However, the University would like the option to provide up to 100% graduate student accommodation as units for couples/families for both post graduate taught and post graduate research students on the site.
- 17.3. The University considers, therefore, that the phrase "that there should be no net increase in student accommodation units" in the Policy is inappropriate and makes it unsound.
- 17.4. The site at present is well used and liked by graduate families with partners and children, who make up the majority of those living there. It is a very suitable location in Oxford for this specific type of graduate student. The University needs the option to increase the number of homes it can offer to graduate families at Court Place Gardens because it is one of the best opportunities in its portfolio to achieve this. The original planning permission (72/25454/A_H) at Court Place Gardens was for 36 Graduate Married Accommodation Units.

Common Ground

- 17.5. The Parties agree that Court Place Gardens is entirely suitable for Use Class C3 housing. The Parties agree, after taking into account the important constraints at the site, there is potential to make better use of the site. The Parties also agree that Use Class C3 self-contained accommodation for graduate couples/families could include employer-linked affordable housing and graduate student accommodation or a mix of both.
- 17.6. The Parties agree that because the site is suitable for C3 graduate accommodation the policy restriction concerning 'no net increase in student accommodation' should be removed.

Proposed Main Modification

- 17.7. For clarity, the University of Oxford consider that the following main modifications to Policy SP35, set out in track changes below would ensure the policy is in line with the overall approach and therefore ensure its effectiveness.

Policy SP35: Court Place Gardens

Planning permission will be granted for graduate student accommodation or employer-linked affordable housing or a mix of both uses at Court Place Gardens. ~~There should be no net increase in student accommodation units.~~ Planning permission will not be granted for any other uses other than ancillary uses.²

Through the redevelopment of the site it must be demonstrated that the new design will have a positive effect on the setting of the listed building compared to the existing development.

Development should be designed to ensure that there is no adverse impact on the Iffley Meadows SSSI. To minimise impact upon the Iffley Meadows SSSI, development proposals will be expected to incorporate Sustainable Urban Drainage Systems and may be required to be accompanied by a groundwater study.

Accompanying text changes

9.200 There is potential to make better use of the site whilst respecting and improving the setting of the listed building. The existing graduate student accommodation should be replaced with new graduate accommodation or with ~~residential~~ **employer-linked affordable housing** or a mix of both uses. ~~The site is not within an area that satisfies the student accommodation Policy HP4 so there should be no net increase in students living on the site.~~

Matters in dispute

University of Oxford comments

- 17.8. The University considers that the standard on-site affordable housing requirement of Policy H2 should not apply to this site. Any element of Policy H3 employer-linked affordable housing on the site would be affordable housing for rent and any element of Policy H8 new student accommodation would be on a site where the existing use is student accommodation. .

² The University of Oxford has lodged an objection to this phrase. See Matters in Dispute on page 20

Furthermore, there has never been any general housing on the site and the University of Oxford consider that it is not suitable for such a use.

Oxford City Council comments

- 17.9. OCC does not consider that this site should be exempt from making contributions to affordable housing simply because it is currently in use as student accommodation. The site is considered a suitable site for employer-linked affordable housing and market housing (which would be required to deliver 50% on-site affordable housing). If any part of the site is redeveloped as student accommodation contributions should be made to affordable housing.

Policy SP49: Old Power Station.

Common ground

- 18.1. The Parties agree that the change proposed in the City Council's response to the Inspectors' question 43 (so the list of uses includes 'academic institutional' use) overcomes the University's concerns.

Policy SP53: Oxford University Press Sports Ground, Jordan Hill

Common Ground

- 19.1. OCC, as part of its assessment of the potential contribution of sites within the city has rolled forward Policy SP45 in the adopted Sites and Housing Plan and allocated this site for residential use. The Parties agree that this is a suitable allocation for the site.

Matters in Dispute

University of Oxford comments

- 19.2. The University of Oxford has lodged an objection because it considers that the list of permitted uses should include employer-linked affordable housing and student accommodation. The University considers that this site at Jordan Hill is very suitable to provide staff and graduate student accommodation. The University considers that the site is well located, within an established local community, on a good radial public transport bus corridor and within cycling distance of Summertown district centre and the University's core academic buildings. This would ensure that the new housing would be occupied by 'essential workers of the city' and post graduates to help alleviate the problems of the city's housing needs.

Oxford City Council comments

- 19.3. OCC does not consider that this change is necessary to make the Plan sound. The site is outside of the limited types of sites where employer-linked affordable housing may be considered; extending this definition would be at the expense of delivery of on-site social rented housing. Furthermore, the site is not necessary to enable the University to meet its student threshold set by Policy H9 and it is not in a location listed as suitable for student accommodation in Policy H8. The City Council does not consider the site is a suitable location for student accommodation. The policy does not preclude the University from retaining the market element of a scheme for their own purposes and managing the stock as private rented dwellings for staff.

Policy SP 63: West Wellington Square

Common ground

- 20.1. The Parties suggest the following modification for consideration of the Inspectors to ensure the policy wording is effective.
- 20.2. Amend the first sentence of the policy as follows: 'Planning permission will be granted for academic institutional, student accommodation, ~~and~~ employer-linked housing, and, within the Local Centre, uses appropriate to Policy V4 at West Wellington Square

SP Policies: “Planning permission will not be granted for any other uses” in policy wording

Matters in dispute

University of Oxford comments

- 21.1. The University has lodged an objection to the inclusion of the phrase in almost every SP Policy “Planning permission will not be granted for any other uses”. It considers this phrase is unnecessary and inconsistent with national policy. In addition, it would limit OCC’s flexibility to give favourable consideration to uses that it might wish to permit.
- 21.2. This is a matter that the Inspectors have asked a question about, at Question 6 in their initial questions and comments, (IC. 1) and subsequent document (IC1. A). Therefore, the University is content with the arguments put forward by the Inspectors and sees no value in elaborating further in this SoCG.

Oxford City Council comments

- 21.3. The City Council consider this wording is necessary and will continue to justify this approach through their written statements.

University of Oxford sites in housing trajectory

Common Ground

- 22.1. The following University sites have been included in the City Council’s housing trajectory following engagement on the delivery timescales between the Parties.

University of Oxford comments

- 22.2. Sites are indicated with an asterisk * where there is doubt about their delivery because of outstanding University objections to OLP policies. With the proviso that the University’s OLP objections have led to Modifications to the relevant policies, it agrees these are a realistic assessment of what is likely to come forward and when.

Site name	Net number of homes	Submission of planning application	Determination of application	Commencement on site	First completions	Site completed
Banbury Rd/Winchester Rd University Sites *	60	2020/21	2020/21	2021/22	2022/23	2024/25
Court Place Gardens, Iffley ³	54	2020/21	2020/21	2021/22	2022/23	2022/23
Diamond Place and Ewert House*	120	2022/23	2023/24	2024/25	2024/25	2025/26
Faculty of Music*	40	2024/25	2025/26	2026/27	2026/27	2026/27
Oxford University Press Sports Ground	130	2024/25	2025/26	2026/27	2026/27	2027/28
University of Oxford Science Area and Keble Rd Triangle*	20	2024/25	2025/26	2026/27	2026/27	2026/27
West Wellington Square	18	2020/21	2020/21	2021/22	2022/23	2023/24
Radcliffe Observatory Quarter*	48	2024/25	2025/26	2026/27	2026/27	2026/27
Summertown House, Apsley Rd*	20	2024/25	2025/26	2026/27	2026/27	2026/27
Osney Mead	247	2024/25	2025/26	2026/27	2026/27	2030/31
Park Farm, Marston	60	2024/25	2025/26	2025/26	2026/27	2027/28

³ The housing trajectory number at Court Place Gardens is now 90, giving a net increase of 54 once account is taken of the existing 36 units on the site. This is the most recent assessment of the total capacity of the site, down from 100 which had been communicated earlier to OCC.

Signed on behalf of Oxford City Council

Name: Carolyn Ploszynski

A black rectangular box redacting the signature of Carolyn Ploszynski.

Position: Planning Policy and Place Manager, Oxford City Council

Date: 2 December 2019

Signed on behalf of University of Oxford

Name: Dr David Prout

A black rectangular box redacting the signature of Dr David Prout.

Position: Pro-Vice-Chancellor (Planning & Resources)

Date: 2 December 2019

