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OXFORD CITY COUNCIL

Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: James Weedon

Organisation (if applicable): E3 Cap

Address: [redacted]

Email: [redacted]

Date: 3 March 2026

Data protection:
Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2040 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2040 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

☒ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.

☐ If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	◉	○
Do you wish to be notified when:		
the Council submit the Oxford Local Plan 2045 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2045 is adopted by the Council?	◉	○

GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

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

If you have any questions please feel free to get in touch with the Planning Policy Team
T: 01865 252847
planningpolicy@oxford.gov.uk
www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	Policy H14	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☒ No
(b) is sound?	☐ Yes	☒ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	☑	(c) effective?	☑
(b) justified?	☑	(d) consistent with national policy?	☑

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Pleas see my attached comments

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

The policy should be deleted entirely as it is not justified or amend it to support the provision of boarding school accommodation where the need for it is established and it would not conflict with other policies in the Plan which would outweigh the need for it. Reword the supporting text to support the provision of boarding accommodation subject to there being no significant adverse pressure on the housing stock, no transport problems and that suitable management arrangements are in place to ensure no adverse amenity impacts.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Notes on responding to the Regulation 19 Consultation

We have published the Oxford Local Plan 2045 Proposed Submission Draft for consultation before we submit it for examination[1] by an independent Planning Inspector. Any comments received will be considered by the City Council and the Inspector.

In these notes we explain the criteria that the inspector will use and that you should also use when commenting on the plan.

The planning inspector will consider whether the document:

- complies with the **LEGAL REQUIREMENTS**; and
- is **SOUND**.

DUTY TO CO-OPERATE

The Inspector will check that the Proposed Submission Draft meets the duty to co-operate as set out in the Act[2]. The Act states that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

LEGAL REQUIREMENTS

To comply with the legal requirements, the Proposed Submission Draft must:

- be identified in the Local Development Scheme[3];
- have involved the community as set out in the Council's Statement of Community Involvement[4];
- be published in line with the procedure for publishing a policy document, as set out in the regulations[5];
- have involved the production of a Sustainability Appraisal Report[6].

SOUND

To be sound[7] the Proposed Submission Draft must be:

- positively prepared
  i.e. providing a strategy which, as a minimum, seeks to meet the area's objectivel assessed needs and is informed b agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified
  i.e. it is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective
  i.e. the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy
  ie enabling the deliver of sustainable development in accordance with the policies of the NPPF.

GENERAL ADVICE

If you are seeking a change to the document, please check that you have:

- made it clear in what way the document is unsound in regard to the legal requirements and tests of soundness set out above;
- stated precisely how you think the document should be changed;
- supported your comment with evidence showing why the document should be changed; and
- provided all the evidence and supporting information necessary to support or justify your comment and the suggested change, as there will not normally be a later opportunity to comment further.

If you are part of a group who share a common view on how the document should be changed, it would be very helpful for that group to send a single response that represents the view, rather than for many individuals to send in separate comments that repeat the same points. In such cases the group should state how many people it represents and how it has been authorised to do so.

Further detailed guidance on the preparation, publication and examination of DPDs is provided in in the National Planning Policy Framework and National Planning Policy Guidance.

Useful links

National Planning Policy Framework: (particularly section on Plan Making: paragraphs 35 - 37)

The Town and Country Planning (Local Planning) (England) Regulations 2012

The Planning and Compulsory Purchase Act 2004

Local Development Scheme;

Statement of Community Involvement

If you would like further advice, please contact the Planning Policy team at: **planningpolicy@oxford.gov.uk; 01865 252847**

[1] In accordance with the Planning and Compulsory Purchase Act 2004 (as amended).
[2] As set out at Section 20(5)(c) and Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended)
[3] A programme of work, setting out the documents the Council proposes to produce.
[4] A document that sets out a strategy for involving the community in preparing policy documents.
[5] This includes publication of appropriate supporting documents by making them available at the Council's offices at St Aldate's Chambers and publication on the Council's website. In addition the Council must notify particular organisations and any persons who have requested to be notified
[6] A tool for appraising policies to ensure they reflect social, environmental and economic factors.
[7] Soundness is explained fully in the NPPF at paragraph 35

JAMES WEEDON

Comments:

Policy H14 and supporting paragraphs

Policy H14 states as follows:

Proposals for new or extended boarding school accommodation for children ages 18 and under will only be accepted where it is on or immediately adjacent to a main teaching campus of the school the children will attend, and it is in accordance with the other policies of the Development Plan

It is supported by paragraphs which do not accurately reflect the accommodation provided to students/pupils and provide no recognition of the benefits of boarding schools in social, cultural, and economic terms to the community and where the need for boarding accommodation will arise from time to time. It seeks to put aside the need for such provision *as they are not counted in calculations of housing need, or in monitoring of housing completions, but they do sometimes seek similar types of sites to residential developments*.

The supporting text concentrates on the alleged negative effects which can arise without adequate evidence, there being no proper assessment of the contribution of boarding schools to the community, or of the potential needs which may arise over the plan period. Indeed, the negative effects described are not borne out by the limited number of planning permissions granted recently (see below).

Oxford's private schools make a substantial contribution to Oxford's economy as well as to education generally. This has been broadly accepted since the Oxford Local Plan 2001-2016 Inspector's report when the City Council proposed controls over the provision of student accommodation which would have adversely affected them. Employment in and the contribution towards Oxford's economy of the education sector (including boarding schools) is one of the strengths of the Oxford economy. The schools support local services and amenities, whilst boarding accommodation normally requires only operational car parking, minimising any traffic impacts, and the schools are able to provide detailed and effective management controls.

There are a number of schools in Oxford which provide boarding accommodation for students/pupils. The schools provide significant employment opportunities and have a significant role in the education sector, providing education for many hundreds of children in and around Oxford. The sector is important socially, culturally, and economically to Oxford.

Some schools have relied historically on home-stay accommodation for its students/pupils but this is becoming increasingly difficult to obtain due to changing social norms and changing economic circumstances. In addition, requirements for boarders are becoming stricter and the need for additional accommodation may arise as a consequence. Further, due to the demise of some schools as a consequence of increased costs of operation, there is demand for increased spaces to be made available for those schools which remain in Oxford.

The Council has prepared Background paper 003: Specialist housing including student accommodation, self-build, elderly persons, gypsy, traveller and travelling showpeople and boat dwellers. The background paper indicates at paragraph 2.9 that there are no policies which apply to boarding accommodation in local or national policies. Whilst technically

correct, the comment ignores important elements of the NPPF which indicate that education is a strategic issue which development plans need to address (paragraphs 20 and 27). It ignores paragraph 100 of the NPPF which states:

100. It is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

a) give great weight to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications; and

b) work with early years, school and post-16 promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Boarding accommodation is a critical element of certain educational establishments, the need for which should be recognised.

The Paper refers to a number of assessments in respect of other forms of accommodation but there is no assessment of the significance of either the need for boarding accommodation which may arise, the importance of it to educational establishments in the private sector, or the importance of the sector generally (there is also little recognition in the Employment Background Paper 4 or the Iceni Paper). There has been no contact with the relevant schools such that little if any information has been available to the Council in order to undertake any proper assessment or to understand their needs over the plan period.

Background Paper 3 includes reference at paragraph 3.7 to 2 planning applications made for new boarding accommodation, both of which have either been completed or commenced. It does not indicate whether there have been rejections of boarding house proposals, those approved being able to be judged competently in relation to its development plan policies without a separate policy provision. A third more recent planning application for Wychwood School (application reference 23/02411/FUL) was permitted on 19 December 2024.

In the case of both D'Overbroeck and Wychwood Schools, its needs were unable to be met by development on or adjacent to its campus, the accommodation being provided on a site which contained some housing and a former tennis court, respectively. The former has provided replacement for the housing, and the latter involved no loss of housing. Both sites are distant from the schools, the transport issues being able to be readily overcome. St Edwards School made use of space between existing buildings on part of the campus to expand the existing boarding houses as it was in the envious position to have space to do so, a condition not repeated in many other instances.

Background Paper 3 explains that the approach of the Council is to *prevent the loss of dwellings, especially with the significant competition for land and sites in Oxford,* there being long-standing self-contained policies which cover this issue. Paragraph 5.34 indicates that there is a preferred approach which relates to limiting the locations for such boarding accommodation but there is **no proper justification** provided for the strict limits for, as noted in the permissions granted already, it is possible to accommodate boarding accommodation elsewhere without causing significant housing loss or amenity and transport problems.

Indeed, the options provided in the Background Paper jump to the requirement for a policy because *the context of Oxford would encourage a policy as Oxford has a very large housing*

need with significant competition for land and sites. Each option is accompanied by a wholly inadequate analysis which neither considers the realistic impacts of each, leading to a preferred approach which ignores other options.

The background of successful proposals (limited in number) being submitted on a number of sites does not indicate that the conclusions reached are at all justified. There is no justification for the restrictive locations proposed, being those on or adjacent to existing campus sites. A number of the schools are in residential areas and the policy is aimed at reducing pressure on the housing stock meaning that new accommodation could not effectively be provided: in some cases they are in a conservation area, for example in North Oxford, where further institutional uses are frowned upon, again effectively preventing their provision. There is no explanation as to what the transport and amenity issues are and why the chosen locations are the only acceptable ones, given that boarding accommodation already exists off campus in many cases and has been permitted for both D'Overbroeck and Wychwood Schools. As the Background Paper notes, safeguarding, safety and security are matters for the schools whilst effective management is able to be provided by the schools. Why are other locations for example in the district centres, regarded as appropriate for other students, not appropriate, for boarding accommodation? Boarding accommodation is clearly a form of housing, Policy E1 of the Local Plan, referring to some employment sites, accepting that some may be appropriate for housing in certain circumstances. Simply because "*they are not counted in calculations of housing need, or in monitoring of housing completions, but they do sometimes seek similar types of sites to residential developments*" (the supporting text) is a wholly inadequate way for them to be judged.

As the assessment of the options in the Background Paper notes, the options are similar to each other and are unlikely to have significant sustainability impacts in the manner measured by the Council. A restrictive policy could, however, have an impact on the sustainability of the schools, the employment opportunities they provide, and the social and community contributions which they make, education being a matter to which great weight should be given.

Background Paper 4 recognises the importance of the education sector to Oxford's economy. It notes that the NPPF also seeks to ensure that policies help build a strong, responsive, and competitive economy, and that Councils should create conditions where businesses can invest, expand, and adapt (paragraph 2.8). This equally applies to schools and is supported by one of the objectives set out at the start of the Background Paper to "*Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation*", including "*Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education, and apprenticeships to make the most out of new job opportunities created in the city*".

Iceni has provided the Council with a report titled "Oxford Student Needs Assessment". It does not include a complete assessment of need in relation to boarding accommodation and has not sought to address all educational needs which arise. Its report notes that this is a limitation of its conclusions. It has contacted a number of further educational colleges and language schools (Appendix 1 of its report) but has not engaged with other schools where accommodation needs may arise. Nonetheless, it concludes that " it is highly unlikely that this *quantum of need emanating from students at the schools and colleges will equate to a significant need for accommodation"*.

Consequently, it is equally unlikely that there would be such adverse impacts from boarding accommodation that the restrictive nature of policy H14 is at all justified.

If it is decided that a provision in the Local Plan is justified, it should be positive, supportive, and not include the restrictive locational elements currently included.

Regulation 18 Consultation:

Appendix 1, below, sets out the comments made in relation to the Regulation 18 consultation, and which are not wholly repeated above, but should also be considered. The Council's response to the objection that the policy is unjustified and that there is no justification for the locations criteria included (see page 108 of the Council's response to comments) simply states:

The location of the new boarding development may affect the safety and amenity of students and local residents and neighbouring residential properties.

The suggestion that other locations "may" have these effects is not supported by evidence and is not supported by the history of recent permissions. It is entirely insufficient to justify the policy.

Appendix 1

Comments made at Regulation 18 Stage

1. Oxford's Private Schools, including boarding, make a substantial contribution to Oxford's economy as well as to education generally. This has been broadly accepted since the Oxford Local Plan 2001-2016 Inspector's report when the City Council proposed controls over the provision of student accommodation which would have adversely affected them. Employment in and the contribution towards Oxford's economy of the education sector (including boarding schools) is one of the strengths of the Oxford economy. The schools support local services and amenities, whilst boarding accommodation normally requires only operational car parking, minimising any traffic impacts.

2. The Draft Local Plan 2042 indicates that there is "no national policy or guidance on boarding accommodation development" but that is to ignore the specific provision in the NPPF which states at paragraph 20 c) that strategic policies should, inter alia, make sufficient provision for education. Paragraph 100 also makes clear that LPAs should take a proactive, positive and collaborative approach to meeting the communities' needs for education and to development that will widen the choice in education.

3. The provision of boarding accommodation for students at the schools is in principle no different from the provision of other student accommodation which authorities are able to take into account in the housing land supply (see Paragraph: 025 Reference ID: 68-034-20190722 of the PPG).

4. The pressure on the existing housing stock and the need for more housing is understood. However, in order to continue to operate effectively, to enable them to grow or respond to changing requirements, and to enable the contribution towards Oxford economy and education to continue, a balanced view needs to be taken. This has occurred in the past and examples are D'Overbroecks in relation to its recent permission for boarding accommodation at 472 - 474 Banbury Road, and the planning permission granted at land north of Charlbury Road. These related to the redevelopment and replacement of existing houses, and the redevelopment of tennis courts respectively, both sites being distant from the main teaching campuses. In each case the Council was satisfied as to the impacts on each of those matters set out in paragraph 2.59, without the further requirements included in Draft Policy H16. In particular, the requirement for accommodation being on or in immediately adjacent to a campus is not adequately justified in the policy.

5. The Schools are concerned that the policy may unduly restrict those schools requiring new boarding accommodation and restrict their ability to take up opportunities which do not normally arise "on or immediately adjacent to a main teaching campus". The campuses themselves will rarely have the ability to accommodate new buildings for boarding accommodation.

6. Whilst the policy is positively worded relating to the limited times when a development would be on or immediately adjacent to a main teaching campus, there is no reason why, for example, sites within the City Centre or District centres should not be regarded as similarly suitable or why , if the development control issues included in paragraph 2.59 are adequately addressed, a positive view should not be taken of those proposals.

The Council had no difficulty in assessing the proposed developments at 472-474 Banbury Road and the tennis courts north of Charlbury Road, concluding that in each case they were acceptable. In such circumstances, the provision of boarding accommodation could assist in reducing pressure on the City's housing stock, management controls can adequately deal with neighbour impacts, safety would be assured as it is as important for the schools as it is for others, and transport impacts are unlikely to be inappropriate to the extent that any would be regarded as severe.

7. The paragraphs 2.57 to 2.59 take an unduly negative view which reflects the approach which the Council sought to take in a former Local Plan , which the Examining Inspector did not support. If a separate policy is needed, which the objectors doubt is the case given the adequacy of current development control policies, the positive benefits of the provision of boarding accommodation by the schools should be celebrated and the policy broadened to support proposals where there is either no loss of dwellings or such loss is justified; where there would be no unreasonable adverse impact on neighbours; where management controls are provided to ensure that the development would be safe and secure; and where any transport impacts would be minimised.