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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 Smith

Organisation (if applicable): Ridge and Partners LLP (on behalf of Worcester College)

Address: [redacted]

Email:

Date: 12/03/2026

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 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 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		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.

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.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

RIDGE

BUILT
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CONSULTANCY

10/03/2026

[redacted]

www.ridge.co.uk

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

Issued via email to: planningpolicy@oxford.gov.uk

Dear Planning Policy,

CONSULTATION RESPONSE: OXFORD LOCAL PLAN 2042, PROPOSED SUBMISSION DRAFT (REGULATION 19)

Ridge and Partners LLP write on behalf of our client, Worcester College (constituent College of the University of Oxford), to provide a consultation response with regards to the *'Local Plan 2045 Proposed Submission Draft'*.

This letter follows on from a previous representation submitted in August 2025 on the Regulation 18 Local Plan. It is not the intention of this letter to repeat comments within the previous letter, which is appended; however, it is noted that all comments provided continue to stand for the Regulation 19 consultation. As a summary this includes:

- The College agrees with the objectives set out in the draft Local Plan, with notable support for the need to support Oxford's reputation as an international destination for high quality education and learning.
- Concerns are raised on the rigidity of some of the policies. Notably policies C4 and G1 had overarching policies which restrict development and provide no opportunity for site specific development considerations. To that effect, the College requested that further consideration was given to the above suggestions to allow for appropriate protection whilst at the same time ensuring that development can be considered based on site specific assessments and wider needs.

Further to these objections, the college can confirm that they are progressing development proposals for a new library within the College Grounds, which will partly impact the proposed Core Green Infrastructure. The aim of which is to submit to the Council within the calendar year. There also remain ambitions to provide additional student accommodation within the college in the longer Local Plan timeframes.

Given the objections, and current ambitions, the college politely requests that the Council considers the concerns raised. They also wish to underline their willingness to work with the Council on the Local Plan.

Should the Council wish to discuss any comments further, please contact James Smith at this office or via [redacted] We look forward to discussing this at a meeting at your earliest convenience.

Yours faithfully,

[redacted]

James Smith

[redacted]

For Ridge and Partners LLP

[redacted]

Ridge is the trading name of Ridge and Partners LLP. A Limited Liability Partnership registered in England No. OC309402
Registered office [redacted]

Enc. Regulation 18 Consultation Response.

RIDGE

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08/08/2025

[redacted]
www.ridge.co.uk

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

Issued via email to: planningpolicy@oxford.gov.uk

Dear Planning Policy,

CONSULTATION RESPONSE: OXFORD LOCAL PLAN 2042, DRAFT DOCUMENT FOR CONSULTATION (REGULATION 18)

Ridge and Partners LLP write on behalf of our client, Worcester College (constituent College of the University of Oxford), to provide a consultation response with regards to the *'Oxford Local Plan 2042, Draft Document for Consultation'*.

This letter is structured as follows:

- Background to Worcester College and its future aspirations
- Identification of relevant policies and any associated evidence base documents, with responses to key matters including:
  - Draft Policy H10: Location of New Student Accommodation
  - Draft Policy H11: Linking New Academic Facilities with the Adequate Provision of Student Accommodation
  - Draft Policy C4: Protection, Alteration And Provision Of Learning And Non-Residential Institutions
  - Draft Policy G1: Protection of Green Infrastructure
- Summary of position

Worcester College Context

Worcester College grounds and buildings are located on the junction of Beaumont Street, Walton Street and Worcester Street in the centre of Oxford. Oxford Canal is situated to the south-west. An aerial image showing the location of the College, and key buildings/grounds is set out below. The College comprises buildings primarily situated along the north and east of the site, interspersed with formal and informal garden areas, a lake at the centre, and sports facilities in the western portion of the site.



Figure 1: Worcester College Site (Google Maps)

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Registered office [redacted]

bsi ISO 9001 Quality Management Systems CERTIFIED EMS 538031 | ISO 14001 Environmental Management CERTIFIED EMS 538031 | ISO/IEC 27001 Information Security Management CERTIFIED EMS 538031 | ISO 45001 Occupational Health and Safety Management CERTIFIED EMS 538031 | BIM Design & Construction Capital/Delivery ISO 19650-1 and -2 VERIFIED EMS 538031

At the end of 2022, the College launched a 'Five Year Strategy' that forms the basis for its policies, operational plans and day-to-day decision-making. The Vision within the document is *'to excel as an Oxford college that is forward-looking, outward facing, and contributes to society; a college that balances tradition and innovation'*. In order to achieve this vision, the College places importance on academic excellence, creating an inclusive culture and embedding sustainability into all long-term planning, while remaining agile and attentive to the rapid changes, innovations and demands of the 21st century.

With the vision in mind, the College is presently seeking to enhance its facilities with the provision of a new library and graduate accommodation buildings. In seeking to achieve these facilities, and other ambitions, the College remains conscious of the wider constraints of the site, which includes:

- It is within Central (City and University) Conservation Area
- I has a Grade II* Listed Park and Garden, with multiple Listed Buildings on eastern edge
- The majority of its green space is within Flood Zone 2, with small pockets of surface water flood risk.
- The area identified as 'Worcester College Cricket Ground' is allocated for outdoor sports in the adopted Local Plan. This area is inclusive of tennis courts and additional pitches.
- The Cricket Ground is part of Green and Blue Infrastructure Network in the adopted Local Plan
- The East part of the site is within City Centre Archaeological Area

The majority of the College grounds is now proposed to be part of a Green Infrastructure Network 'Core' designation in the emerging Local Plan consultation. A comparison of the original green infrastructure designation and revised area designation is provided in Figure 2 below.



Figure 2: Original allocation (blue line) compared to proposed allocation (green shading)

Consultation Overview and Responses

The relevant documents reviewed as part of this consultation feedback include:

- Oxford Local Plan 2042, Draft Document for Consultation (Regulation 18), June 2025
- Interactive Policies Map
- Employment and Inclusive Economy, Background Paper 004
- Green Infrastructure and Biodiversity, Background Paper 005
- Urban Design, Placemaking, Heritage and Archaeology, Background Paper 011

- Liveable City, Background Paper 013
- Infrastructure Delivery Plan (IDP) (Interim 2025)
- Green Infrastructure Study 2022 Main Report (with associated appendices 1-4)
- Oxford Student Needs Assessment 2023

Whilst Worcester College do not wish to comment on all polices and impacts within the consultation, the headline policies and responses are listed within the following subsection.

Draft Policy H10: Location Of New Student Accommodation

The consultation confirms at paragraph 2.39 that there is a need to acknowledge, support and build on the important economic and educational role of the Universities and other educational institutions, whilst managing potential adverse impacts that a large number of students resident in Oxford may have on established communities and on the availability of general market and affordable housing. To support this, Draft Policy H10 states that:

> *"Planning permission will only be granted for student accommodation in the following locations:*
> - *On or adjacent to an existing university or college campus or academic site, or hospital and research site, and only if the use during university terms or semesters is to accommodate students being taught or conducting research at that site; or*
> - *In the city centre or a district centre; or*
> - *On a site which is allocated in the development plan to potentially include student accommodation."*

Worcester College acknowledges the ongoing support for educational accommodation and confirms the general **support** for the proposed policy wording. It is however suggested that wording be adjusted to confirm that if the criteria are unable to be met, then there is a requirement to demonstrate that there are no reasonable alternatives available.

Draft Policy H11: Linking New Academic Facilities with the Adequate Provision of Student Accommodation

It is acknowledged that with the provision of further educational facilities, there is the possibility to create additional accommodation needs. To avoid impacts, Draft Policy H11 states:

> *"Planning permission will only be granted for new redeveloped or refurbished academic, research or administrative facilities for higher education institutions where it can be demonstrated that either:*
> *a) The new facilities would not generate or facilitate any increase in student numbers; or*
> *b) There is a plan in place for managing the accommodation needs of the additional students, either because the institution has sufficient existing accommodation, or because sufficient accommodation has been identified as being available. For Oxford Brookes University and the University of Oxford this criterion will be measured and can be demonstrated through application of the threshold of the number of qualifying students living outside of relevant student accommodation, as follows:*
>
> *University of Oxford*
> *Planning permission will only be granted for new/redeveloped or refurbished academic or administrative facilities that generates or facilitates an increase in student numbers) for University of Oxford where the number of full-time taught course students living in Oxford requiring accommodation does not exceed the level of university owned or managed accommodation by more than the following thresholds at the time of the application:*
> - *Until the academic year starting in 2033: 2,500*
> - *Academic year starting 2033 onwards to be negotiated based on consideration of the situation at the time."*

It should be noted that whilst being a constituent college of the University of Oxford, Worcester College is a separate legal entity to the University. On this basis, it would not be reasonable for the College to have facility restrictions placed upon them whilst they cannot fully control other institutions. To remedy this concern, the College would seek

additional wording such as; *"Unless demonstrated that facilities associated with constituent colleges will have no impact on existing accommodation requirements for the relevant college"*.

Overall, Worcester College agree with the need to balance enhancements with the provision for student accommodation

and can confirm **general support** for Draft Policy H11, however **amendments are sought** to ensure they are not unduly restricted by wider University of Oxford constraints.

Draft Policy C4: Protection, Alteration And Provision Of Learning And Non-Residential Institutions

Draft Policy C4 sets out a range of requirements for planning permission being granted for new learning and non-residential institutions. This includes the need to be sustainably located, meeting local needs or existing deficiencies, supporting regeneration, avoiding environmental or amenity impacts and community use. Similarly, it confirms requirements for redevelopment or loss of facilities.

These policies and criteria are in principle supported; however, the policy confirms *"This does not apply to academic institutions exclusively for 18+ students such as the University of Oxford and Oxford Brookes University."* This statement is **objected** to, with the basis of this being that there is no alternative policy that is considered to be comparable and allowing objective assessment of the need for new facilities. If the policy is to be brought forward, the caveat should be removed, or an alternative University development specific policy should be proposed.

Draft Policy G1 – Protection of Green Infrastructure

Draft Policy G1 confirms the City Council will seek to protect the green infrastructure network for the many and varied benefits it offers. In accordance with the Worcester College Vision, it is confirmed that there is general agreement on the importance of protecting and enhancing these spaces.

It is however noted that policy has shifted to include a tiered structure of Green Infrastructure which is:

- Core
- Supporting
- All other

Worcester College is identified as a 'Core' space which has been generally defined as *"fundamental role in supporting the city-wide network through wildlife habitat and corridor functions, flood storage, intensity of use and strength of heritage or other local value, which means they are not easily moved elsewhere. It is considered that these spaces cannot be moved/reprovided sufficiently without compromising the overall character and function."*

The step down to 'Supporting' green infrastructure space is defined as *"These spaces play an important role in enhancing the network and its overall function, and their loss will be resisted; however, there is more opportunity for reprovision. As such change of use which is accompanied by reprovision to another part of the network, ideally onsite, to the same standard or higher will be accepted. … it is accepted that there could be changes over time."*

For Core spaces the draft policy states that:

> *"Planning permission will not be granted for development that would result in loss of, or harm to, the protected spaces identified as Core Oxford Green and Blue spaces and the important green network function they provide."*

Paragraph 4.6 of the supporting text highlights that *"the draft policy would seek to protect all public and private green infrastructure in the city from inappropriate development and ensure that, where it comes forward, development mitigates any potential impacts."*

The proposed wording is a deviation from Policy G1 of the adopted Local Plan, which does not rank Green Infrastructure and confirms that planning permission will not be granted for development that would result in harm

to the Green and Blue Infrastructure network, except where it is in accords with relevant mitigation or exceptions identified in supplementary policies.

Based on the above, this policy wording and allocation methodology is **objected** to for a number of reasons:

1. The allocation for Core and Supporting arbitrarily draws a line between one and the other, without any reasonable balance being provided to a sliding scale of quality both internally within individual Green Infrastructure, or when comparing the lowest quality Core against the highest quality Supporting.

2. The assumption that Core 'spaces cannot be moved/re-provided sufficiently without compromising the overall character and function' is subject to each site's individual merits and proposals. For example, Core areas may have lower quality sub-areas within them. This conclusion should not be drawn at this stage and result in a blanket in-principle ban on development within designated areas.

3. The proposed wording conflicts with the aim of the policy as outlined at Paragraph 4.6 as outlined above, which seeks to protect Green Infrastructure from 'inappropriate development', requiring mitigation where development comes forward.

4. The Core policy wording has no flexibility for the scale of green or blue infrastructure, scale of existing and proposed development, exceptional circumstances, or the possible wider reprovision or enhancement of the infrastructure.

The above policy has been informed by the Council's 'Green Infrastructure and Biodiversity, Background Paper 005'. However, on review of this document, the considerations for various options underline the concerns raised above. Most notably 'Option B' within the Background Paper is for a 'a hierarchy of protection' (as is proposed within the Draft Local Plan), however the identified 'potential negative/neutral consequences' for this states that *"categorising sites may be subjective exercise and run risk of deprioritising spaces that may still bring about benefits."* The wording for Option B also states that the hierarchy will 'allow for development in exceptional circumstances', although this wording is not taken forward in the Draft Local Plan.

The Background Paper does suggest 'Option A' is for *'all spaces in the network would be treated with equal protection, based on presumption against any net loss'*. This approach would be supported by the College as it would allow for site specific assessment to be undertaken, rather than a subjective two-tier approach to the application of policy.

To amend the policy wording to something that could be supported by the College, the following updates are requested:

1. The principle of 'Core' and 'Supporting' be removed, in line with Option A of the Background Paper, as well as the approach currently within the adopted Local Plan. The overarching policy wording should seek protection, but acknowledge that the loss may be justified subject to adequate re-provision or enhancements, and / or sufficient justified evidence of the need for the development in the context of wider site function and use.

   OR

2. Alternative policy wording for Core sites, with the allowance for development in 'exceptional circumstances', as recommended by Option B of the background paper.

Through the application of updated policy wording, it is considered that the Council will be able to protect and enhance Green and Blue Infrastructure, whilst at the same time ensuring that appropriate development can be considered based on site specific assessments and evidence of wider needs and impacts.

Summary

Worcester College can confirm that it supports the wider visions and objectives set out in the draft Local Plan, with particular support for the acknowledgement of the need to support Oxford's reputation as an international destination for high quality education and learning.

Despite the wider support, concerns are raised on the rigidity of some of the policies. Notably policy C4 and G1 have overarching policies which restrict development and provide no opportunity for site specific development considerations. To that effect, the College politely requests that further consideration is given to the above suggestions to allow for appropriate protection whilst at the same time ensuring that appropriate development can be considered based on site specific assessments and wider needs.

Taking the above in to account, the College wish to underline their willingness to work with the Council on the Local Plan. Should the Council wish to discuss any comments further, please contact James Smith at this office or via jamessmith@ridge.co.uk. We look forward to discussing this at a meeting at your earliest convenience.

Yours faithfully,

[redacted]

James Smith

[redacted]

For Ridge and Partners LLP

[redacted]