

Introduction

This Statement has been prepared by Ridge and Partners LLP on behalf of Worcester College (constituent College of the University of Oxford), in relation to the proposed allocation of the entirety of the Worcester College grounds and buildings as 'G1A: Core spaces' under draft Policy G1.

It is submitted in response to the Inspectors' Matters, Issues and Questions for the Examination of the Oxford Local Plan 2045 and addresses Matter 3, Issue 2, as identified by the Inspectors in the 'Matters, Issues and Questions for Stage 1' document published on the 8th September 2026.

As necessary background to contextualise this Statement, Worcester College have been undergoing extensive pre-application discussions with Oxford City Council ('OCC') in relation to two proposed developments:

- The Sir Lindsay-Owen Jones Library - to be located in the northeastern corner of the College's grounds. A full planning application has now been submitted. Pre-application discussions were positive, with OCC confirming that the proposed library at this site is acceptable in-principle.
- New graduate accommodation – to be located in the northwestern corner of the College's grounds where hard surface tennis courts currently exist. To confirm, the proposals will not result in the loss of any sports provision. OCC have also been supportive, in-principle, for the proposed redevelopment of this site for this use.

Response to Matter 3: Spatial Strategy and Approach to Development

Issue 2: Core Green Infrastructure Network – Policy G1

Q.1 Is the identification of Core Green Infrastructure justified and consistent with national planning policy?

Paragraph 32 of the National Planning Policy Framework ('NPPF') (December 2024) requires the preparation of Local Plans to be underpinned by proportionate evidence to support and justifying the draft policies. However, the evidence underpinning Policy G1 does not demonstrate that every part of Worcester College performs an irreplaceable green infrastructure function.

Chapter 15 of the NPPF relates to the conservation and enhancement of the natural environment. Paragraph 188 makes clear that plans should distinguish between a hierarchy of designated sites of international, national and local importance and take a strategic approach to maintaining and enhancing green infrastructure network. It is accepted that OCC are, therefore, justified in identifying sites of such value and allocating these as part of a green infrastructure network in order to seek that their important functions are taken into consideration when determining applications.

We do however question whether this is justified where it concerns areas of land that are already controlled or protected through other designations. Paragraph 16 of the NPPF makes clear that plans should avoid unnecessary duplication of policies, including those contained within the NPPF, that apply to a particular area. For Worcester College, this includes the historic parkland which is already heavily protected in terms of its

heritage designation, where development which causes harm to the historic parkland needs to be given 'great' weight and the level of harm triggers other policy considerations, for example, paragraph 214 in relation to substantial heritage harm and paragraph 215 in relation to less than substantial heritage harm (taken forward in the 2026 NPPF by the HE policies, in particular HE4, HE5, HE6 and HE9) .

Draft Policy G1 seeks to introduce a tiered structure of green infrastructure as follows:

- G1A: Core spaces
- G1B: Supporting spaces
- G1C: All other green spaces

Supporting text to Policy G1 confirms that Core spaces and Supporting spaces are defined as follows:

"Core spaces - designated at highest level in hierarchy due to their fundamental role in supporting the city-wide network for reasons such as providing wildlife habitat and corridor functions, flood storage, intensity of use and strength of heritage or other local value. These benefits are typically intrinsic to their location, which means they are not easily reprovided elsewhere without compromising their character and/or function."

Supporting spaces – designated for their important role in enhancing the network and its overall function. Their loss will be resisted; however, there is more opportunity for reprovision. It is unlikely that any of these spaces could be found to be surplus, although it is accepted that there could be changes over time."

The entirety of Worcester College's open space is proposed to be designated as Core Green Infrastructure, whereby Policy G1 states that planning permission will not be granted for development that would result in loss of, or harm to, the protected spaces identified as part of the Core Green Infrastructure Network. This lack of flexibility in the policy means that it is ultimately more restrictive than policies dealing with heritage assets. Furthermore, the fact that Core spaces cannot be developed for certain types of development (or mitigated for sufficiently without compromising the overall character and function of the area) is contrary to the policies contained within Chapters 15 and 16 of the NPPF which make clear that development proposals affecting designated heritage assets and key green infrastructure can be considered acceptable in certain circumstances. The policy is not appropriately justified and isn't positively prepared (paragraph 16 of the NPPF).

One final point to make is that the evidence provided does not explain clearly why the entirety of Worcester College, including buildings, service areas and other developed areas, as well as locations identified through pre-application discussions with OCC as being suitable in-principle for the proposed library and graduation accommodation, should be afforded the same level of protection as the undeveloped gardens. Indeed, through the site feasibility study discussions undertaken with OCC in 2024 and the more recent pre-application discussions, which have been supported by site-specific heritage assessments, it has been demonstrated

that the proposed development locations (referred to at the outset) comprise areas of comparatively lower heritage significance and that they can therefore accommodate the proposed redevelopments without harm to the elements of the Registered Park and Garden that contribute most strongly to the College's heritage value. A more proportionate, evidence-based approach would therefore be required to distinguish those parts of the College that perform an irreplaceable green infrastructure function and those areas where carefully designed development could be accommodated whilst preserving the overall significance and important functions of the overall designation pursuant to Worcester College.

Q.2 How did the approach to Core Green Infrastructure (as set out in Policy G1) inform strategic decisions for growth? Is this justified, positively prepared and consistent with national planning policy?

In relation to Worcester College, there is insufficient evidence to demonstrate that the identification of their entire estate as Core Green Infrastructure has informed strategic decisions for growth across the district in a justified or proportionate manner.

Paragraph 16 of the NPPF requires Local Plans to be prepared positively and to support the delivery of sustainable development. Paragraph 20 goes on to require plans to include strategic policies which make sufficient provision for the Plan area's development needs, including educational development and student accommodation requirements. The NPPF also encourages making the most efficient use of previously developed land within sustainable urban locations. Oxford city centre faces acute land constraints and a well-documented need, as illustrated in the adopted Local Plan, for continued support for the growth and operation of its universities and colleges which contribute significantly to the city's economy, culture and international standing.

Accordingly, Worcester College continues to invest greatly in its buildings and grounds and has identified a need and an opportunity to deliver both a new, accessible library facility and additional graduate accommodation on already developed land within the College estate. The College has identified a clear need for a new library building due to the insufficient capacity and facilities at the existing library to support the needs of the College and its students and staff. Furthermore, the new library will support the College in attracting new students in the future, helping the College to compete with other Colleges and Universities nationally and internationally and therefore delivering significant economic benefits. Equally, the College is in great need of new graduate accommodation given that they can currently only accommodate approximately a third of their students on-site. These are just two current examples. There will no doubt be others in the future. As such, the majority of students lose the benefits of living at the College and are forced into Oxford's private rental market which has associated knock on effects for both the market and the students who typically pay much more in rent than those living at the College. The Local Plan recognises this to be a genuine problem which it seeks to address by encouraging additional accommodation for university students.

Against this background, the allocation of the entirety of the College as Core Green Infrastructure is contrary to a development strategy that seeks to accommodate sustainable growth within the Plan area. Furthermore, the Plan provides no explanation as to how the blanket designation at the College is balanced against the need

to facilitate education investment, including graduate accommodation as per Policies H8 and H9 of the emerging Local Plan.

A positively prepared plan should rather identify opportunities for, or at the very least accept the circumstances, where heritage and environmental value can be balanced alongside sensitive and necessary new development. By applying the highest level of protection across the entire College, as set out by Policy G1, risks sterilising land that has already been successfully demonstrated to OCC as being capable of accommodating development without unacceptable heritage impacts on the Registered Park and Garden, the setting of listed buildings and the Conservation Area more widely. This suggests that the strategic approach has not sufficiently balanced competing planning objectives, contrary to the integrated approach encouraged by national planning policy. For these reasons, the approach is not justified and is inconsistent with national planning policy.

Q.3 Is the approach to restricting all forms of development affecting Core Green Infrastructure justified?

OCC's intention under this Policy to restrict all forms of development affecting Core Green Infrastructure is not justified. The approach is unnecessarily inflexible and is inconsistent with the established principle in national policy that planning decisions should be based on assessments of the specific impacts of individual development proposals. For example, sites located within the National Landscape are not subject to an outright ban on development but rather must demonstrate that exceptional circumstances exist and that the proposed development is in the public interest (paragraph 190 of the NPPF) in order to be granted planning permission.

The blanket restriction of any development within such spaces will, in practice, introduce what amounts to a policy presumption against development, irrespective of the scale of harm, the significance of the affected area, the public benefits the scheme would bring and the potential for mitigation, re-provision and enhancement. As illustrated above, the NPPF does not generally impose absolute prohibitions on development affecting heritage assets or high value green infrastructure. Instead, it requires decision-makers to weigh harm against public benefits and to consider opportunities for mitigation, re-provision and enhancement. Even in relation to designated heritage assets, paragraph 208 of the NPPF requires a balanced assessment rather than an automatic refusal of development.

Moreover, as detailed above, the proposed wording of Policy G1 departs from the adopted Local Plan which recognises that development affecting green infrastructure may be acceptable where relevant mitigation or policy exceptions apply. The draft policy removes this flexibility without providing robust evidence to justify such a significant tightening of the policy framework. The consequences for Worcester College are particularly acute as Policy G1 would prevent the aforementioned developments from coming forward despite positive engagement with OCC on both schemes and for which robust heritage assessments have confirmed they could be delivered without harm to the significance of the Registered Park and Garden due to their sensitive siting, scale and layout. Policy G1 would therefore frustrate the delivery of otherwise sustainable development

opportunities. One may fairly ask, wouldn't it be perverse that two schemes which are heavily constrained by heritage related matters, but are considered to be acceptable in all other respects, are refused because Policy G1 doesn't support any form of development?

Q.4 Is Policy G1 justified, effective and consistent with national planning policy, especially where the reuse and redevelopment of open space is proposed?

The proposed wording of Policy G1 is neither justified nor effective because, as detailed above, it fails to provide a mechanism through which appropriate development proposals on sites allocated as Core spaces can be assessed on their merits. The blanket restriction on development and designation of the entire College as Core Green Infrastructure creates a conflict between OCC's support for ongoing educational investment at the College and the restrictive policy framework proposed. Such a conflict creates uncertainty and undermines the effectiveness of the Local Plan.

Furthermore, and to reiterate, national planning policy encourages the efficient use of land and supports the delivery of education development in sustainable locations. It also recognises that conservation of the historic environment should be managed in a way that protects and enhances significance whilst allowing heritage assets to remain viable and relevant for future generations. A policy that effectively prevents development within areas of comparatively lower heritage sensitivity fails to achieve this balance.

Policy G1 is particularly problematic where redevelopment is proposed within existing developed parts of a Core space or within areas that make a more limited contribution to green infrastructure functions. No evidence has been provided to demonstrate that every part of Worcester College performs an irreplaceable green infrastructure function and in the absence of such evidence, a blanket restriction cannot be regarded as justified. In acknowledgment of this, in Chapter 4 of Appendix 3 of the Consultation Statement (ref: CSD.003), OCC state the following in relation to Policy G1:

"As set out in the Background Paper (005a), core spaces are designated because they are considered to provide a range of important benefits including some which are tied to their existing location, the loss of which is considered unfeasible to be able to be mitigated through re-provision elsewhere. It is considered important that they are appropriately protected to a degree that reflects their identified value as part of the wider green infrastructure network.

However, having further reviewed the approach, a potential modification could be made to the wording in relation to the approach to protecting core spaces. This would provide some flexibility to allow compatible uses to come forward, whilst still seeking to set a strong level of protection that corresponds with the identified value of these spaces and also retaining particular identified benefits in situ."

OCC then go on to say:

"A potential modification that could overcome this objection would be to amend wording of policy as follows:

G1A: Core spaces

Planning permission will not be granted for development that would result in loss of, or harm to, the protected spaces identified as part of the Core GI Network unless this would be for complementary uses that would not negatively impact upon the particular in situ benefit(s) for which these spaces are designated, and if this is accompanied by enhancement of other parts of the core space. These spaces are designated G1A on the policies map."

While a modification to the Core spaces element of Policy G1 is supported in principle, it is considered that the above modification suggested by OCC would still be overly restrictive. It is also unclear as to what the in-situ benefits would be in the context of the College. Nonetheless, assuming that the proposed library and graduate accommodation would be complementary uses in the sense that they would complement the in-situ benefits for which the green space is designed, the College would still have to demonstrate that other parts of the Core space are enhanced. This could, for instance, require the demolition of existing buildings to offset the visual impact of the new building proposed which is simply not feasible in what are areas commonly occupied by buildings which tend to make positive contributions to the area rather than visually detract from them.

In light of the above, the following modifications to the wording of Policy G1 are recommended:

1. The principle of 'Core' and 'Supporting' be removed, in line with the approach currently within the adopted Local Plan. The overarching policy wording should continue to seek to conserve the key green infrastructure but should also provide opportunities for appropriate development to occur where sufficient, justified evidence of the need for the development and the associated public benefits in the context of wider site function and use is provided.

OR

2. Remove all sites from Policy G1 which have Registered Park and Garden or Conservation Area designations given that they are already sufficiently protected by the relevant paragraphs of the NPPF. This approach would avoid unnecessary duplication of policies as required by paragraph 16 (f) of the NPPF.

To summarise, in its current form, Policy G1 is not justified because the evidence does not demonstrate why it is necessary or appropriate to designate the entirety of Worcester College as Core Green Infrastructure given the College is already subject to a registered park and garden designation which ensures the protection of the grounds' green infrastructure functions. Furthermore, the Policy is not effective because it creates an unjustified policy conflict with the delivery of educational development associated with the College which

OCC support, in principle. Finally, the Policy is not consistent with national policy because it removes the opportunity for balanced decision-making on proposals affected heritage assets as required by paragraph 208 of the NPPF and fails to give appropriate weight to the expansion and enhancement of higher education facilities. Worcester College therefore respectfully requests that the Inspector recommend modifications to Policy G1 to ensure that the policy is evidence-based, proportionate and consistent with national planning policy. This could be achieved through one of the two aforementioned suggested modifications.