



Chadwick Town Planning

**Oxford Local Plan 2045
Examination**

Hearing Statement

**Matter 3 – Spatial Strategy and Approach to
Development**

**Issue 5 – Strategy for Student Accommodation –
Policies H8, H9 and H14**

Hearing Date: 22nd October 2026

**Prepared by Chadwick Town Planning Ltd for Lincoln College
(Respondent ID No. 102)**



Final Version – 7th October 2026

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Duncan Chadwick, Managing Director of Chadwick Town Planning Limited ('CTPL'), on behalf of The Warden or Rector and Scholars of the College of the Blessed Mary and All Saints Lincoln in the University of Oxford ('Lincoln College' or 'the College'), who own the Sports Ground and land at Bartlemas Close, Oxford which is proposed to be allocated for residential development (including graduate accommodation) via Policy SPE7 of the *Oxford Local Plan 2045* ('the Plan').
- 1.2 Founded in 1427, Lincoln College is an academic college of the University of Oxford and celebrates its 600th anniversary on 13th October 2027. During this time, the College has educated thousands of students, refurbished and developed its historic buildings and its property portfolio and established itself as a place of cutting-edge research.
- 1.3 The College provides accommodation for undergraduates in the centre of Oxford for the duration of their course. The accommodation is just a short walk from the main College site at Turl Street, Oxford. This helps students attend tutorials, dine in College, study in the Library, or spend time in the Junior Common Room. It is also close to all the shops, cafés, restaurants and amenities in the centre of Oxford.
- 1.4 The College's *Strategic Plan 2022-2027* sets out that one of Lincoln's strengths is its collegiate character and the positive contributions made by all parts of the College community: Fellows, students, staff, and alumni. In the period to 2027, its 600th anniversary, the College seeks to achieve many objectives not least to ensure that Fellows and students have adequate buildings and facilities by providing more teaching rooms for Fellows and more accommodation, especially for their postgraduates and married students.
- 1.5 This will not only meet the College's aspirations for its Fellows, students, staff, and alumni but also help towards meeting housing need and the City's housing requirement, both generally and for more University-provided accommodation in Oxford. It will also help release housing accommodation into the market and assist housing supply generally in the City, which has an urgent and pressing need for more homes – both affordable and market – which it is unable to accommodate within the City's boundary.
- 1.6 As landowner of a proposed site allocation within the Plan and of an existing allocation via Policy SP43 in the adopted *Oxford Local Plan 2036*, the College has

worked closely with Oxford City Council ('the Council') throughout the Plan-making process. This positive, collaborative approach is documented in the *Statement of Common Ground between Oxford City Council and Lincoln College* ('SOCG') dated June 2026, submitted to the Inspectors as part of the Examination documents of the Plan. This SOCG and the accompanying appendices set out the changes that the two parties have agreed to overcome most issues the College had initially identified with the *Submission Version* of the Plan. A list of the agreed changes or "Proposed Modifications" agreed between the two parties is included in the Table at Appendix A of the SOCG as well as being listed in the *Schedule of Minor Modifications* and *Schedule of Main Modifications* submitted separately by the Council with the full Local Plan submission. Common ground has, however, not been reached between the Council and the College in relation to proposed amendments to Policy H3 of the Plan regarding affordable housing contributions.

- 1.7 Subject to the above-mentioned "Proposed Modifications" being accepted and included within the Plan in respect of Policy SPE7 and any further [separate] representations on Policy H3 as part of the examination of the Plan, Lincoln College considers that the Plan has been positively prepared, is justified, effective and consistent with national policy in relation to housing needs and the housing requirement and is therefore 'sound' in relation to Paragraph 36 of the *National Planning Policy Framework, 2024* ('NPPF').
- 1.8 This Statement responds to the Inspectors' Matters, Issues and Questions regarding Matter 3 – "Spatial Strategy and Approach to Development". This is particularly in respect of Issue 5 – "Strategy for Student Accommodation – Policies H8, H9 and H14" and specifically in relation to student or graduate accommodation for the University of Oxford, the needs of the city and the important contribution the Colleges and the University of Oxford make towards meeting the City's housing needs and housing requirement and delivering the Plan's spatial strategy.
- 1.9 The focus is placed here as it seems more appropriate and relevant than on Matter 2 – "Housing and Employment Needs" and Issue 5 – "Older People and Student Accommodation Needs", which contains closely related questions about the need for student accommodation over the Plan period and how the Plan ensures that the needs for student accommodation will be met over the Plan period.
- 1.10 This Statement should be read and considered in conjunction with previous representations made on the Plan on behalf of Lincoln College and the agreed Statement of Common Ground with the Council.

2.0 MATTERS, ISSUES AND QUESTIONS

Policy and City Context

- 2.1 Before addressing the Inspectors' Questions on this Matter and Issue, it is worth setting out the planning context for student accommodation in the City. Policy H9 of the adopted *Oxford Local Plan 2036* sets threshold figures for full-time taught degree course students living outside of university-provided accommodation at no more than 1,500 for University of Oxford and no more than 4,000 for Oxford Brookes University. To inform the Council's annual *Authority Monitoring Report* ('AMR') the universities provide information relating to their student numbers and the number of student accommodation rooms they provide. Unfortunately, but understandably given academic terms, the monitoring period that the universities use does not directly coincide with the period of the AMR.
- 2.2 In the *AMR, 2025* the University of Oxford reported that there were 26,595 students attending the University (and its Colleges) as of 1 December 2024. After deducting agreed exclusions (e.g. part-time students, research-based post-graduate degree students, etc.) there were 14,959 full-time University of Oxford students with accommodation requirements. As of 1 December 2024, there were 14,407 accommodation places provided across the collegiate University. This leaves a total of 552 students the policy applies to living outside of University provided accommodation in Oxford. See Figure 1.

Monitoring year	Total number of students	Students needing accommodation in Oxford	Units of university provided student accommodation	Students living outside of university provided accommodation
2016/17	23,179	17,753	14,976	2,777
2017/18	23,975	18,221	15,047	3,508
2018/19	24,289	18,112	15,409	2,703
2019/20	24,510	18,413	16,299	2,114
2020/21	25,816	14,724	13,715	1,009
2021/22	26,439	14,873	13,382	1,491
2022/23	26,497	14,653	13,975	678
2023/24	26,945	15,404	14,603	801
2024/25	26,595	14,959	14,407	552

**Figure 1 - University of Oxford's student numbers 2016/17 – 2024/25
(AMR, 2025)**

- 2.3 This is lower than the previous monitoring year and is within the threshold of Policy H9 of the adopted *Oxford Local Plan 2036*. It is likely to be the product of a slight decrease in the total accommodation places from the previous monitoring period (14,603 to 14,407) and in the total number of students attending the University (26,945 to 26,595).

- 2.4 Oxford Brookes University reported a total of 21,856 students attending the university as of 1 December 2024. After deducting exclusions, there were 8,226 full-time Oxford Brookes University students with accommodation requirements. As of 1 December 2024, there were 5,094 accommodation places provided by Oxford Brookes University, leaving a total of 3,132 students without a place in university provided accommodation living in Oxford. This is within the threshold set by Policy H9 of the adopted *Oxford Local Plan 2036*. Again, there was a decrease in the number of Oxford Brookes students living outside of university provided accommodation in the city in 2024/25 but there was also an increase in the number of University provided student accommodation units since the previous monitoring year.

Student accommodation completions in 2024/25

- 2.5 As set out in *Planning Practice Guidance*¹, student accommodation can be counted in housing land supply figures. This can be converted² into a number of equivalent dwellings using a ratio of 2.4:1 as set out in Paragraph 10 of the Government's *Housing Delivery Test Measurement Rule Book*. See Figure 2.

Monitoring Year	Number of student rooms completed	Ratio Applied	Number of equivalent 'dwellings'
2016/17	295	2.5:1	118
2017/18	452	2.5:1	180
2018/19	187	2.5:1	75
2019/20	1337	2.5:1	535
2020/21	628	2.5:1	251
2021/22	131	2.5:1	52
2022/23	266	2.5:1	107
2023/24	84	2.5:1	34
2024/25	55	2.4:1	23

**Figure 2 - Student housing completions and equivalent 'dwellings'
2016/17 – 2024/25 (AMR, 2025)**

- 2.6 There was only a modest contribution in the last couple of years but over the *Oxford Local Plan 2036* plan period to date (AMR 2024/25 Table 10), student accommodation equated to 1,375 dwelling-equivalents — about 31% of total net completions (4,417) and equivalent to roughly 73% of the volume of market dwelling completions (1,891) over the same period (NB - student provision is recorded separately from C3 market dwellings in the AMR). This is a significant proportion and a considerable contribution to housing supply at a time of acute

¹ [Housing supply and delivery - GOV.UK](https://www.gov.uk/government/publications/housing-supply-and-delivery)

² [Housing Delivery Test Measurement Rule Book on GOV.UK](https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book)

demand and limited supply due to numerous constraints in the City (e.g. limited availability of greenfield sites; heritage and environmental designations; etc.). This considerable contribution can be seen in Figure 3.

Year	Market Dwellings Completed	Affordable Dwellings Completed	Student Rooms Completed (Number of Equivalent 'dwellings') - See table 15 for details	Care Home Rooms Completed (Number of equivalent 'dwellings')	Other communal accommodation Completed (Number of equivalent 'dwellings')	Total dwellings completed (net)
2016/17	284	20	295 (118)	-6 (-3)	n/a	419
2017/18	170	17	452 (180)	0(0)	n/a	367
2018/19	158	105	187 (75)	36 (20)	n/a	358
2019/20	118	104	1337 (535)	59 (33)	n/a	790
2020/21	322	144	628 (251)	-11 (-6)	n/a	711
2021/22	243	274	131 (52)	-13 (-7)	34 (19)	581
2022/23	142	273	266 (107)	0 (0)	57 (32)	554
2023/24	280	61	84 (34)	0 (0)	-18 (-10)	365
2024/25	174	75	55 (23)	0 (0)	0 (0)	272
Total:	1891	1073	3435 (1375)	65 (37)	73 (41)	4417

Figure 3 – Housing completions by housing type (OLP 2036) – AMR, 2025

Question 1 - What is the need for student accommodation over the Plan period? Is this set out in the Plan?

- 2.7 The need for student accommodation up to 2033/34 is addressed in the *Updated Specialist Housing Needs Evidence Final Report (December 2025)* by Iceni Projects on behalf of the Council.
- 2.8 This Report refers to data from the Council's AMR 2024/2025, which as set out above, shows that in that monitoring year Oxford Brookes students filled 5,094 bedspaces provided by the University in the city; University of Oxford provided 14,407 students bedspaces in the same year.
- 2.9 Additional student accommodation "pipeline sites" with permission will add 398 bedspaces to the University of Oxford supply. The Report by Iceni Projects also

refers to several allocated sites which are expected to provide additional student bedspaces. Some of these may not come forward as student accommodation (but other types of housing) and as such a ratio of 2.4 was applied assuming they will provide non-self-contained rooms, but they could provide self-contained accommodation. These sites could provide an additional 411 bedspaces for the University of Oxford.

- 2.10 Table 6.8 of the Report by Icen Projects reproduced as Figure 4 shows the “Updated Supply Demand Balance”

Table 6.8 Updated Supply Demand Balance		
	Oxford Brookes	University of Oxford
FT Students requiring accommodation in 2033/34	10,670	18,366
Current Supply (from AMR 2024/25)	5,094	14,407
Sites with Permission	0	398
Allocated Sites		411
Total Pipeline		809
Shortfall to 2033/34	5,576	3,150
<i>Source: Icen Projects</i>		

Figure 4 – Student Accommodation Supply/Demand Balance (Icen, 2025)

- 2.11 This identifies a shortfall of 5,600 student bedrooms (rounded) related to Oxford Brookes University and 3,000 student bedrooms related to the University of Oxford, a combined shortfall of 8,600 bedrooms, which if not met by the Universities (and Colleges) through the delivery of additional student accommodation would need to be accommodated within the wider housing market, and in particular in the private rented sector, to 2033/34.
- 2.12 The conclusions of the Report are analysed in terms of policy options for the Plan in the Council’s *Background Paper 003: Specialist housing including student accommodation, self-build, elderly persons, gypsy, traveller and travelling showpeople and boat dwellers* ('Background Paper 003').
- 2.13 The *Background Paper 003* indicates that both Universities have predicted a growth in student numbers, which the Plan needs to respond to. However, given the many variables, it is difficult to be certain over the longer term (i.e. to 2045)

in respect of the future recruitment of students. Factors that can influence this may be within the Universities' control (e.g. fees, facilities, courses offered, maintenance of academic reputation) but are as likely to be outside their influence (e.g. Government policy, macro-economic situation). As a result, the *Background Paper 003* indicates that both Universities felt unable to accurately forecast over more than a short-medium timeframe. Therefore, a threshold has only been included in draft Policy H9 of the Plan to 2033.

Question 2 - How does the Plan make provision to meet the identified needs for student accommodation?

- 2.14 Figure 4 above summarises the need for student accommodation in 2033/34 as 3,150 for the University of Oxford [and 5,576 for Oxford Brookes University]. This represents a 21.8% increase over current supply of University-provided student accommodation or circa 350 student rooms per annum over the next 9 years.
- 2.15 This has only been achieved in three of the last 9 years, which shows the scale of the task ahead for the University of Oxford and its Colleges and the general housing market.
- 2.16 The *Background Paper 003* states that the approach of the Plan is to acknowledge, support and build on the important economic and educational role of the Universities and other educational institutions, whilst managing potential adverse impacts they may have, on established communities and on the housing market.
- 2.17 The Plan seeks to manage the pressures of students, whilst recognising and responding to the forecast needs of educational institutions that have a housing need (predominantly the Universities). It aims to strike a balance between encouraging students into University-provided accommodation because it frees up family housing, whilst controlling such accommodation in some areas because they take up new sites that could be used for new family housing.
- 2.18 Hence, one leg of the Plan's approach is to encourage universities to provide accommodation through the "thresholds" or Policy H9 of the Plan by limiting new/redeveloped or refurbished academic or administrative facilities (that generates or facilitates an increase in student numbers) for the 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 3,100 up to the academic year starting in 2033. Other policy approaches are to limit the over-concentration of HMOs, only allow student accommodation in the most suitable locations.

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- 2.19 Hence, the Plan looks to make provision to meet the identified needs for student accommodation largely via the Universities, Colleges and the institutions themselves linking new or redeveloped academic accommodation to the delivery of associated residential accommodation.
- 2.20 The provision of additional student accommodation on University/College-owned land to meet the needs of the University/College – such as at Lincoln College’s Sports Ground at Bartlemas Close – is therefore vitally important in helping to address identified needs for student accommodation housing but also wider housing need in Oxford since it can:
1. Improve the position and objective of the Plan regarding the number of students in non-University provided accommodation;
 2. Add to the City’s housing stock overall;
 3. Effectively utilise suitable sites, in this case an under-used part of the Sports Ground, which does not affect playing pitches;
 4. Ensure good quality student accommodation is provided on appropriate sites (e.g. providing all the desired amenities, locating them where it is desirable for students to live and which can be effectively managed by the College) that avoids unacceptable changes in character or increases in activity/noise/disturbance along quieter residential streets);
 5. Release accommodation (e.g. family housing) into the market;
 6. Ensure mixed and balanced communities; and
 7. Deliver sustainable development.
- 2.21 The land at Bartlemas Close (Policy SPE7 of the Plan) is an existing College site, would directly meet College student accommodation needs and therefore would not be suitable for market housing. It will continue to be owned by the College to meet the needs of the College as an educational institution and the accommodation needs of its students. In such circumstances, the College considers that Policy H3 of the Plan should not apply to the proposed graduate accommodation at Bartlemas Close, as the policy states that contributions towards affordable housing provision from new student accommodation will not be sought where, inter alia, the proposal is within an existing or proposed university or college campus site, as defined in the glossary to the Local Plan. The College considers that the Plan and the glossary should be amended to refer to such sites as this - which does not impact upon playing field provision (i.e. it is excess land) - as being within the scope of Policy H3, so as not to unduly affect their deliverability, given the need for such accommodation in the City and its significant contribution to housing provision in Oxford.
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Question 3 - Would the proposed locational focus of new student accommodation as set out in Policy H8 ensure that there would be sufficiently mixed and balanced communities across the Plan area? How would this approach create and/or maintain mixed and balanced communities and is it justified?

- 2.22 The College considers that the locational criteria set out in Policy H8 should ensure that there would be sufficiently mixed and balanced communities across the City providing that the Plan fully recognises, supports and builds upon the vitally important economic and educational role the Colleges, Universities and other educational institutions play in the success of Oxford. It is generally the case that the most suitable locations for students are those on existing University or College sites – such as at Bartlemas Close - because everything is on hand for students, they can be managed and controlled and they avoid any sort of potential conflict with other housing types, communities and the character of an area.

Question 4 - How would the approach set out in Policy H9 adequately ensure that the provision of student accommodation would be conditionally linked to the provision of new academic facilities? How would this be delivered and monitored?

- 2.23 This is assessed at the planning application stage and requires that schemes for all new education, teaching and academic institutional proposals (excluding providers of statutory education) demonstrate how they support the objectives of the wider development plan and align with its other policies (e.g. provision of accommodation). This is also monitored through the annual AMR. The “backstop” is the threshold in Policy H9 for the two Universities. If this is breached - which for the University of Oxford is unlikely since there is currently a gap of 2,548 students between the threshold (3,100) and the number of students not in University-provided accommodation (552) - the University would be prevented from gaining planning permission for new academic facilities that generate or create additional capacity for students.
- 2.24 There have been and will inevitably continue to be applications for new academic and other facilities where the argument has been made and accepted by the Council that the development is unrelated to student numbers and so the thresholds are not relevant. This is a matter of planning judgement based upon the facts and circumstances of the individual case.

Question 5 - Does the approach for the provision of boarding school accommodation as set out in Policy H14 reflect the overall strategy for student housing set out in the Plan? Does it also reflect the overall spatial strategy as set out in Policy S1?

- 2.25 We have no comments on this question since it does not relate to the University of Oxford and Lincoln College.

3.0 CONCLUSION

- 3.1 Lincoln College’s overarching position on the *Oxford Local Plan 2045* is one of support. With the exception of the College’s position on Policy H3³ - which will be addressed in any further separate Statement as part of the Examination - and subject to the “Proposed Modifications” in the agreed SOCG being accepted and included within the Plan in respect of Policy SPE7, Lincoln College considers the Local Plan is soundly based as it has been positively prepared, is justified, effective and consistent with national policy on sustainable development, the provision of specialist housing, making the most effective use of land and other matters.
- 3.2 Housing for students, especially in a city like Oxford, which remains one of the least affordable UK cities for housing but is ranked as the world’s top university for a record eleventh year by the *Times Higher Education World University Rankings*⁴, is an important component of housing need and the City’s housing requirement. An insufficient supply of student accommodation can lead to pressure on the supply of other types of housing affecting the rest of the city. The NPPF and PPG recognise the need for sufficient student accommodation as part of general housing need and meeting housing requirements.
- 3.3 In Oxford, progress is being made such that the number of students living in non-University provided accommodation has been reduced significantly in recent times but there is still a substantial need to accommodate additional students at the University (and Colleges) over the Local Plan period to provide suitable accommodation and avoid adverse impacts upon the wider housing market and communities in the City. This is part of Lincoln College’s *Strategic Plan 2022-2027* and should also help contribute towards meeting the considerable housing need in Oxford, whilst recognising that this cannot realistically be delivered solely within Oxford, requiring assistance from other Oxfordshire districts, to help meet otherwise “unmet” needs.
- 3.4 The development of College-owned land, including at Bartlemas Close, which is the subject of Policy SPE7 in the Plan, which is suitable, available and deliverable can make a direct and significant contribution towards meeting its own graduate and wider accommodation requirements, providing it is not unduly affected by Policy H3. This is a very positive statement by the College, approaching its 600th anniversary, and would assist many others in housing need in the city.

³ The College requests that the wording of Policy H3/the Plan’s Glossary is amended to include College sports grounds/pitches within the definition of an “existing or proposed university or college campus site”

⁴ [World University Rankings 2027 | Times Higher Education \(THE\)](#)