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Katharine Makant
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Dear Katharine

OXFORD LOCAL PLAN 2045 EXAMINATION STAGE 1 HEARING STATEMENT – UNIVERSITY OF OXFORD AND OXFORD BROOKES UNIVERSITY

I write on behalf of the University of Oxford and Oxford Brookes University ('the Universities') to provide below a Hearing Statement in response to the Inspector's Questions, further to our detailed Regulation 19 response and agreed Statement of Common Ground ('SoCG') with Oxford City Council ('OCC').

As agreed with the Inspector, the Universities would like to raise matters the City Council did not wish included in the Matters of Disagreement and therefore we have expressed these points below.

Matter 2 – Housing and Employment Needs

Issue 5 – Older People and Student Accommodation Needs

Q3: What is the need for student accommodation over the plan period? Is this set out in the Plan?

The Universities' position in respect of this Question is set out in the Statement of Common Ground.

Q4: How does the Plan ensure that the needs for student accommodation will be met over the plan period?

The Universities consider Policy H9 needs to be balanced with more flexibility on the location of new student accommodation. The extent to which the Plan will be successful in meeting future student accommodation needs depends upon the availability of suitable sites. The Universities maintain concerns regarding Policy H8 and consider that its locational criteria are unnecessarily restrictive.

Whilst Policy H9 provides an appropriate framework for ensuring accommodation provision keeps pace with academic growth, the Universities consider that greater flexibility within Policy H8 would improve the likelihood of sufficient accommodation being delivered over the plan period. Limiting delivery opportunities to a relatively narrow range of locations risks constraining supply and reducing the ability of both institutions and third-party providers to respond to future needs as well as recycle older, existing stock which may fall out of the available supply.



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Accordingly, whilst the Universities support the overall objective of meeting student accommodation needs through the Plan, they consider that amendments to Policy H8 would assist in ensuring sufficient opportunities exist for delivery throughout the Plan period.

Matter 3 – Spatial Strategy and Approach to Development

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

Q1: What is the need for student accommodation over the plan period? Is this set out in the Plan?

The Universities refer to the Statement of Common Ground and their response to Matter 2, Issue 5, Question 3.

Q2: How does the Plan make provision to meet the identified needs for student accommodation?

The Universities refer to the Statement of Common Ground and their response to Matter 2, Issue 5, Question 4.

Q3: 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?

The Universities consider that the locational criteria are overly restrictive and may limit the ability of both Universities and third-party providers to bring forward student accommodation on sustainable sites. The Universities have advocated additional flexibility, including the potential for purpose-built student accommodation to come forward along key transport corridors and on sites within walking distance of university campuses.

Restricting new purpose-built student accommodation to a limited number of locations risks intensifying existing concentrations of student housing and reinforcing established student enclaves. By contrast, allowing student accommodation to come forward on suitable sites along arterial routes and sustainable corridors would help distribute student populations more evenly across the city. also It is important to note that student accommodation located along arterial routes and sustainable transport corridors was permitted under the Sites and Housing Plan (adopted February 2013) which preceded the current Oxford Local Plan 2036.

With sustainability in mind, National Planning Policy Framework (NPPF, 2026) Policy HO9, introduces a new location test for purpose-built student accommodation which focuses on whether residents can access their place of education by walking, wheeling, cycling or public transport. This approach recognises that sustainably located student accommodation need not be immediately adjacent to educational institutions, provided that high-quality sustainable travel options are available. The Universities therefore encourage Oxford City Council to adopt a similar approach, allowing purpose-built student accommodation to come forward on sites served by sustainable transport corridors where access to educational facilities can be readily achieved without reliance on the private car.

A broader range of locations would also increase choice within both the student and conventional housing markets, reduce competition for sites capable of accommodating either use, and potentially release more centrally located sites for alternative forms of development, including conventional housing. Chapter 16 of the NPPF seeks to promote healthy and inclusive communities, support the provision of

appropriate services by enabling development that contributes positively to community wellbeing whilst helping to reduce inequalities. One of the NPPF's key principles for well-designed places, at policy DP3, is to support healthy, mixed, vibrant and integrated communities...by incorporating a range of uses and tenures, employing features which promote social interaction. A more flexible policy framework would support the creation of mixed and balanced communities in accordance with the NPPF. By contrast, the current policy promotes separation and over-concentration and reduces the opportunities for town and gown to positively interact.

Furthermore, Policy H3 (Affordable Housing Contributions from Other Development Types), which requires financial contributions on a comparable basis to ensure that residential development is not placed at a disadvantage in market or viability terms, is intended to strike an appropriate balance between the delivery of conventional housing and purpose-built student accommodation. In this context, the Universities question whether the introduction of additional locational restrictions is necessary, given that the policy already provides a mechanism to maintain a level playing field between the two forms of development.

The policy is out of step with the character of Oxford as an historic and major centre for learning and research. It also excludes the profile of post-graduate researchers. This class of student falls outside the definition of countable students under Policy H9 as they are in effect, employees positively contributing to the economy. Their profile includes those with families, but many are single and seek single occupancy student accommodation. However, their needs and outlook are different to undergraduate students. Being located away from existing student concentrations is important as they are more aligned with young professionals in the broader population. For Policy H8 to be found sound, it must be modified to take account of the needs of this cohort and adopt a more flexible approach to the location of student accommodation.

Q4: 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?

We will allow the Council to answer this question. The Policy has operated for many years and the Council has a standard condition to address these matters.

I trust that the information and submissions set out in this Hearing Statement will assist the Inspector in considering the matters raised and inform the forthcoming Hearing sessions.

Should you have any questions, please do not hesitate to get in touch.

Chris Pattison
Head of Planning