

**Statement of Common Ground between Oxford City Council and The University of Oxford and
Oxford Brookes University**

Submission Draft (Regulation 19) Oxford Local Plan 2045

October 2026

1.0 Introduction

- 1.1 This Statement of Common Ground ('SoCG') has been prepared between Oxford City Council ('OCC'), and The University of Oxford and Oxford Brookes University ('the Universities') for the Oxford Local Plan 2045.
- 1.2 Oxford City Council is producing a new Local Plan covering the period to 2045. The SoCG reflects the latest position agreed by the parties and is provided without prejudice to other matters that the parties may wish to raise. The area covered by this Statement is Oxford, which is the area covered by the Local Plan. Where matters arise that are cross-boundary, the Council is also working with its neighbouring local authorities and other SoCGs have been prepared on cross boundary matters.

2.0 Background and maintaining effective cooperation

- 2.1 The University of Oxford and Oxford Brookes University are two of the City's principal institutions of higher education and are major landowners and stakeholders within Oxford. Both Universities operate extensive academic, research, innovation, residential and supporting estates across the City and play a significant role in Oxford's economic, social and cultural life. As key stakeholders, the Universities have an important interest in the preparation of the Oxford Local Plan 2045 and its ability to support future investment and growth.
- 2.2 Oxford City Council and the Universities have been engaging closely together throughout the process of developing the Local Plan 2045. The Universities have provided feedback at each of the key stages of the Local Plan consultation process, including the Issues stage (2025), Preferred Options Regulation 18 consultation (2025), and the Regulation 19 Proposed Submission Draft Local Plan consultation (2026).
- 2.3 In addition to formal consultation responses, officers from Oxford City Council have engaged with representatives of the Universities through meetings and ongoing discussions on a range of strategic planning matters, including student accommodation, institutional growth, site allocations and the role of higher education within the City.
- 2.4 The Proposed Submission Draft Local Plan Regulation 19 consultation provided the final version of the Local Plan that Oxford City Council intends to submit for independent examination. Following publication of the Regulation 19 Plan, the Universities submitted representations identifying a number of matters where they considered amendments or further clarification were required to ensure the Plan is justified, effective and deliverable. These principally related to Policies H3, H8, R1, R2 and HD6, together with a series of proposed amendments to site allocation policies affecting University-owned land.

3.0 Matters of Agreement

- 3.1 **Policy H9 (Linking new academic facilities with the adequate provision of student accommodation):** Through discussions during the Regulation 19 stage, the parties have reached agreement on the student accommodation thresholds contained within Policy H9. The parties agree that the threshold approach has been constructively negotiated and as a mechanism will balance the need for academic growth alongside the delivery of student accommodation, whilst also reducing pressure on Oxford's conventional housing stock.
- 3.2 As part of the Regulation 19 consultation response, the Universities sought further clarification regarding the operation of Policy H9 beyond the academic year commencing in 2033. Whilst the Universities confirmed that the proposed thresholds relating to the maximum proportion of students living in non-university owned accommodation are operable, concerns were raised regarding the uncertainty associated with the proposed review mechanism after 2033 and the lack of clarity regarding how any future thresholds would be determined. The Universities advised that greater certainty would be required to support long-term estate planning and investment decisions, particularly in a dynamic sector such as higher education which can experience significant policy changes in short spaces of time e.g. student visas. The parties are now satisfied that the supporting text for Policy H9 under 'Policy Implementation' will satisfactorily deal with changes in circumstances from 2033 onwards.

4.0 Matters of Disagreement

- 4.1 At the point of submission, there remain several policy matters where full agreement has not been reached. The parties acknowledge these areas of disagreement and agree that they can appropriately be explored through the Local Plan examination process:
- 4.2 **Policy H8 (Location of new student accommodation):** 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. The Universities therefore wish to expand the list of suitable locations for student accommodation along arterial routes and sites within a 15-minute walking distance of a campus/college. NPPF 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.
- 4.3 Oxford City Council maintains that the policy is justified, effective and consistent with the wider strategy of the Local Plan. The Council considers that sufficient capacity exists within the locations identified by Policy H8, alongside the thresholds established through Policy H9, to accommodate anticipated student accommodation needs over the plan period. The Council's position is informed by the Oxford Student Needs Assessment and the Updated Specialist Housing Needs Evidence, which identify existing pipeline schemes, allocated site capacity and anticipated windfall delivery. The Council also notes that a broadly similar locational approach has been in place under previous local plans and has not prevented the delivery of new student accommodation, including windfall schemes.
- 4.4 Whilst the parties have not reached agreement on Policy H8, they acknowledge each other's position and agree that this matter can be explored further through the Local Plan examination

process.

5.0 Other Matters of Disagreement

- 5.1 As expressed in their Regulation 19 Response, the Universities have residual concerns regarding the following policies which will be addressed at the relevant hearings at the next stage:
- Policy H3: Affordable housing contributions from other development types
 - Policy R1: Net zero buildings in operation
 - Policy R2: Embodied Carbon
 - Policy HD6: Views and Building Heights
- 5.2 The Universities' Regulation 19 representations also included several detailed suggestions relating to site allocation policies affecting University-owned land, including:
- SPE1 Churchill Hospital;
 - SPE5 John Radcliffe Hospital;
 - SPCW1 Banbury Road University Sites Parcel B;
 - SPCW8 Osney Mead;
 - SPCW12 West Wellington Square;
 - SPN1 Diamond Place and Ewert House;
 - SPN4 Oxford University Press Sports Ground;
 - SPS5 Crescent Hall; and
 - SPE11 Oxford Brookes Marston Road Campus.
- 5.3 The parties agree that these site allocation policies are intended to provide an appropriate framework for future development and that ongoing engagement the examination process will assist in refining the policy framework where necessary.

6.0 Concluding remarks / areas of agreement

- 6.1 Oxford City Council, the University of Oxford and Oxford Brookes University have worked collaboratively throughout the preparation of the Oxford Local Plan 2045. The engagement undertaken has been constructive and has enabled detailed discussion on a range of strategic planning matters affecting the future development of Oxford. Through this ongoing dialogue, the parties have been able to reach agreement on a number of matters, including the approach and thresholds set out within Policy H9 (Linking New Academic Facilities with the Adequate Provision of Student Accommodation).
- 6.2 Whilst there remain a number of policy matters where agreement has not yet been reached, including aspects of Policies H3, H8, R1, R2, and HD6, the parties acknowledge the positive and ongoing dialogue that has taken place throughout the preparation of the Local Plan and commit to continuing engagement throughout the examination process.
- 6.3 This Statement of Common Ground demonstrates that effective cooperation has taken place between Oxford City Council, the University of Oxford and Oxford Brookes University during the preparation of the Oxford Local Plan 2045. It identifies the matters on which common ground has been achieved, including Policy H9, as well as those matters that remain subject to further discussion and consideration through the examination process.

Signed on behalf of The University of Oxford and Oxford Brookes University

Chris Pattison

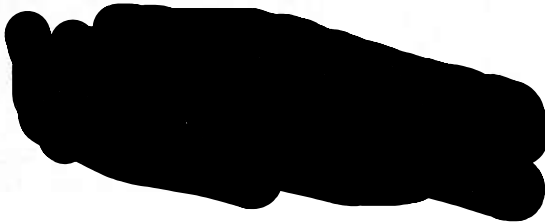
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Title: Head of Planning, Bidwells LLP

Date: 16/10/2026

Signed on behalf of Oxford City Council

Rachel Williams

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Title: Planning Policy and Place Manager

Date: 16/10/2026