Chadwick Town Planning

Oxford Local Plan 2045
Examination

Hearing Statement
Stage Two Hearings

Matter 7 – Type and Mix of Housing

Issue 1 – Affordable Housing from Other Development Types – Policy H3

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

Lincoln College
UNIVERSITY OF OXFORD

Final Version – 9th November 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, a registered charity, 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 its 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 needs 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, 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 (COM.014), 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 ("Proposed Modifications") is included in the Table at Appendix A of the SOCG as well as being listed in the *Schedule of Minor Modifications* (CSD.008) and *Schedule of Main Modifications* (TBC) 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 The Council's position is that in order to be considered a university or college campus some form of academic uses would also need to be present on the site (as set out in the Plan's Glossary). The Council considers that an isolated sports pitch (NB. Presumably this means Sports Ground) would not meet the requirements to demonstrate wider academic use and therefore cannot be considered to meet the criteria set out in Policy H3. As such, the Council indicated that the College's proposed amendment would not be taken forward. (see COM.014)

1.8 The College's comments, concerns and suggested amendments to Policy H3 of the Plan are covered in this Hearing Statement.

1.9 Subject to the above-mentioned "Proposed Modifications" being accepted and included within the Plan in respect of Policy SPE7 and these representations on Policy H3, Lincoln College considers that the Plan has been positively prepared, is justified, effective and consistent with national policy and is therefore 'sound' in relation to Paragraph 36 of the *National Planning Policy Framework, 2024* ('NPPF'), which is the relevant version for the Plan under the legacy plan-making system.

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

Matter 7 – Type and Mix of Housing
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Question 2 - What are the thresholds for affordable housing based on where new student and older persons accommodation is concerned? Does this adequately reflect the viability evidence supporting the Plan?

2.1 The College considers that it is for the Council to explain the basis for the thresholds for affordable housing contributions from new student accommodation. The College's concern is the scope of the exemption from those contributions, and whether the viability evidence supports applying them to accommodation provided by an Oxford College for its own students on its own land.

2.2 As indicated below, the College notes that the Council's viability evidence does not appear to test student accommodation provided by a College for its own students on its own land.

2.3 Policy H3 of the Plan states that on proposals for new purpose-built student accommodation:

a) A financial contribution will be sought towards the delivery of affordable housing from proposals for new student accommodation of 24 or more student units (or 10 or more self-contained student units). Alternatively, the affordable housing contribution can be provided on-site where both the City Council and the applicant agree that this provision is appropriate.

2.4 Policy H3 goes on to state that contributions towards affordable housing provision from new student accommodation will <u>not</u> be sought where: the proposal is within an existing or proposed university or college campus site, as defined in the Plan's Glossary. Policy SPE7 proposes to allocate the Lincoln College Sports Ground for development including graduate accommodation, so on the Plan's own terms it is arguably a 'proposed' College site.

2.5 The Glossary defines "Existing university or college campus or academic site" as:

'An existing university or college campus or academic site is one that exists at the time the Plan is adopted'

2.6 It is worth noting that this definition states only when a site must exist, not what a campus or academic site is. It offers no help on whether a Sports Ground qualifies. It is not clearly written and unambiguous so Policy H3 is not effective without a fuller definition.

2.7 Lincoln College is promoting the use of part of its land at Bartlemas Close for graduate accommodation for its students. This is an existing College site that would be developed by the College for College needs. It is not proposed for market housing or general student housing not related to the College. If developed it would continue to be owned and managed by the College to meet the needs of the College as a long-standing educational institution and the graduate accommodation needs of its students, including post-graduates and married graduates who are in need of suitable accommodation in Oxford at a reasonable rent.

2.8 The Council recognises that high demand and scarce availability mean that Oxford is amongst the least affordable places for housing in the UK. It notes that people on average incomes are priced out of the housing market and private rents are over 50% higher than for England as a whole[1]. College accommodation takes graduates out of the private rented market and makes a contribution that prevents the situation from making the pressure worse.

2.9 The latest figures from the Office for National Statistics ('ONS') reported in October 2026 that the average house price in Oxford was £478,000 in August 2026 (provisional) and that private rents rose to an average of £1,957 in September 2026, an annual increase of 2.4% from £1,911 in September 2025[2]. This puts the cost of housing in the city and home ownership out of the reach of people in occupations like teaching, nursing, transport and retail[3].

2.10 Furthermore, Oxford has a number of constraints on development and in finding suitable sites to meet housing needs, including the Oxford Green Belt, a tight city boundary, heritage considerations and flood zones. Suitable, developable sites are therefore scarce and the Council is relying on neighbouring councils to help meet Oxford's unmet housing needs by allocating further sites within their areas for new homes as close to the city as possible. Oxford's housing need (21,560) when set against anticipated supply (9,041) results in a total unmet housing need of 12,519

[1] https://www.oxford.gov.uk/building-homes/oxford-needs-homes/2

[2] https://www.ons.gov.uk/visualisations/housingpriceslocal/E07000178/

[3] https://www.oxford.gov.uk/building-homes/oxford-needs-homes/2

dwellings between 2025 and 2045[4] needing to come from neighbouring councils, if possible.

2.11 In addition, in general terms, the development market is very challenging at present with developers seeing a significant escalation in costs (labour and materials) and a relatively uncertain market.

2.12 In this context, the College is concerned that Policy H3 of the Plan would apply to the provision of the proposed graduate accommodation at Bartlemas Close. Lincoln College does not have a traditional self-contained campus. Like the rest of the University of Oxford, the College operates on a collegiate system rather than a single campus model. Its historic main site is compactly situated in the heart of Oxford city centre on Turl Street, surrounded by public city streets rather than gated campus grounds. Policy H3 and the Plan's definition appears to have campus-style institutions in mind. However, under the collegiate system a college's academic estate is dispersed between its main site, annexes and sports grounds, and each is functionally part of the college.

2.13 The site at Bartlemas Close is College-owned, used by College students for sport, recreation and other related purposes. These activities are also closely associated with the operation and function of the College as an educational and academic institution.

2.14 The College therefore considers that Policy H3 and the definition in the Glossary to the Local Plan should be amended to refer to such sites as being outside the scope of Policy H3 and therefore exempt from the need to provide affordable housing. Suggested wording is as follows:

Glossary: 'An existing university or college campus or academic site is land which, at the time the Plan is adopted, is owned or occupied by a university or by a college of the University of Oxford and is used for its academic, residential, administrative or ancillary purposes, including sports grounds and playing fields (and associated pavilions and recreational land) used by its students or staff. A proposed university or college campus or academic site is a site allocated in this Plan for university or college uses, including student accommodation.'
Policy H3: add 'including a sports ground or playing field owned or occupied by a university or college' after 'campus site'

[4] https://www.southandvale.gov.uk/app/uploads/2026/07/LPA26-Memorandum-of-Understanding-on-co-operating-to-meet-Oxfords-unmet-housing-need-July-2026.pdf

2.15 Whilst general-purpose student accommodation would reduce pressure on the remainder of the City's housing stock it can create a tension with the provision of other types of housing as the two uses could compete for the same sites. However, this does not apply in this case where the accommodation is on College-owned land, for College purposes and which could be controlled by conditions on any planning permission. In such circumstances, there would be no such tension and affordable housing delivery, would not be compromised.

2.16 By providing graduate accommodation for students on surplus land at the Lincoln College Sports Ground, the College would be responding to existing demand and need for increased provision for students[5]. However, requiring affordable housing contributions in circumstances such as this may have an adverse effect upon the viability of this and similar proposals and in turn frustrate the provision of such accommodation. This would exacerbate the existing pressure on the City's housing stock, fail to achieve the Local Plan's objectives and raise issues of "soundness" for the Plan that could be avoided.

2.17 The Council's *Local Plan Viability Assessment Update (December 2025)* prepared on its behalf by BNP Paribas Real Estate suggests that Policy H3 requirements could be in the form of a financial contribution (for use on general purpose residential developments) or on-site affordable housing, if agreed with the Council. BNP Paribas Real Estate's appraisals indicate that student housing developments should be able to accommodate close to 50% affordable student housing, or financial contributions ranging from £37,175 to £70,176 per room on sites outside the City Centre; and £32,514 to £63,185 per room on sites within the City Centre (the latter being lower due to higher construction costs). The *Viability Assessment* does not appear to reflect a College building accommodation for its own students at a reasonable rent and holding them long term.

2.18 The College's pre-application proposal was to deliver graduate accommodation, addressing the pressing demand for high quality and well-located accommodation to meet the needs of the College's growing graduate community, which would release residential accommodation presently used by graduates into the City's housing market. However, at the rates set out above, affordable housing costs would be considerable (circa £2.1 to £3.9 million).

2.19 The College is a charitable organisation. The principal focus of the College's activities is on its academic work: that is, high quality research and the education of new generations of students in a range of subject areas. The College provides

[5] See Lincoln College's Hearing Statement for Matter 5 – Site Allocations, Issue 3 – Marston Road and Old Road Area of Focus, Policy SPE7 – Lincoln College Sports Ground.

facilities for study, in the form of teaching and seminar rooms, lecture theatres, a Library and co-operative access to the laboratory and other facilities provided by the University of Oxford. It owns and/or leases land or property to support its charitable work but it is not a commercial organisation or developer. In general, College-provided accommodation usually has higher costs of delivering the necessary quality of building and development (as a key institution in the city seeking a long-term legacy), as they are often in sensitive locations and need to meet the College's aim to provide high quality accommodation for its students at a reasonable rent. Such developments have little in common with commercial purpose-built student accommodation schemes. If the intention of Policy H3 is to seek a contribution from commercial developers of purpose-built student housing, it is suggested that the Council and the Inspectors may also wish to consider an exemption for charitable and/or educational institutions, including the College, as a fallback option.

2.20 In general it is the Colleges in Oxford which seek to provide housing for students and, unusually compared with other universities, try to accommodate most of their students as part of the collegiate experience. If the Policy H3 requirement for affordable housing contributions for student accommodation developments by Colleges, on College-owned land, for College purposes remains then it could reduce the scale or possibly delay the delivery of the student accommodation, putting more not less pressure on the wider housing market in Oxford, which would not be justified or "sound" in the context of Paragraph 36 of the NPPF.

2.21 The College therefore respectfully requests that Policy H3 and the Glossary in the Local Plan are amended in line with Paragraph 2.14 of this Statement (1 below), as the College's principal request for a modification to the Plan. The others (2-3 below) are possible fallback alternatives:

1) Include existing College-owned sports grounds and playing fields within the definition of an "existing university or college campus or academic site" (see Paragraph 2.14 for precise wording);
2) Include an exemption from affordable housing contributions when the student accommodation is proposed on an existing College-owned site, for College needs, by the College and is covered by a condition on a planning permission;
3) Include an exemption from affordable housing contributions for charitable and/or educational institutions, such as Lincoln College;

3. 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 H3 – as set out in this Statement - 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 related matters. The principal medication requested to Policy H3 and the Glossary to the Plan is to include existing College-owned sports grounds and playing fields within the definition of an "existing university or college campus or academic site" (see Paragraph 2.14 for precise wording).

3.2 By developing the College's site at Bartlemas Close for student (graduate) accommodation, Lincoln College seeks to address an urgent institutional need whilst contributing positively towards meeting Oxford's housing needs.

3.3 There is a significant housing need in Oxford, including for graduates at the College, who would be most appropriately accommodated in purpose-built, College-provided housing on College-owned land, which can be used more effectively without compromising sports pitches. Housing for students, especially in a city like Oxford, which has a high affordability ratio and expensive private rents for housing, 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. Hence, it would be both disappointing and damaging if Policy H3 was to frustrate or deter College provision of student accommodation. This would restrict the College's ability to provide a greater range of additional accommodation for its students and house as many of its students within its own properties. This would be to the detriment of the College, as it approaches its 600th anniversary, and its students but also the many others in housing need in the city.