


Oxford Core Strategy Examination Statement of Oxford City Council		<a href="http://www.oxford.gov.uk">www.oxford.gov.uk</a>  <b>OXFORD CITY COUNCIL</b>
C/M5/7	<b>Matter 5 – Housing</b> <b>Issue 7 – Student accommodation</b>	

**i) Why is policy CS26 considered necessary?**

It is important that an appropriate balance is maintained between the allocation of land / sites for normal housing (market and affordable) and those sites for student accommodation. This is one of the long-standing issues facing Oxford, and in particular North East and East Oxford in relation to Oxford Brookes.

The Inspector for the Oxford Local Plan (2001-16) said in the Inspector's Report (CD7/7)(para 10.11.4) that *'the growth of the two universities places significant pressure on the local housing market with the resultant implications for the local community.'* He continued (para 10.13.7) *'The fundamental requirement is to minimise the impact of the university on the Oxford housing market. This should be done by capping and reducing the number of students living in accommodation that is not provided by the university.'* If additional student accommodation is not provided, there would be an increase in the number of the students occupying housing that would otherwise be used by families, thus reducing the amount of general housing stock available.

The issues relating to the number of students who live outside University provided accommodation, can be summarised as follows:

- Students living in a shared house in the community are susceptible to unscrupulous private landlords;
- Have an adverse impact on the private rental market – due to the high prices they can afford to pay compared with a family;
- This has had an increased inflationary pressure on houses which could be rented to students as private landlords target these units;
- Cause detriment to the 'community feel' of the area – due to the temporary nature of their time in the property, and the various adverse impacts linked to HMO style of living;
- Adverse impact in terms of numbers of cars / bins / rubbish;
- Lack of care / maintenance of front and back gardens; and
- Noise and other antisocial behaviour late at night / early mornings.

Both the University of Oxford (UO) and Oxford Brookes University (OBU) are proposing increases in the numbers of students. For the UO this is mainly in postgraduate

students. OBU is expecting an increase in undergraduate students of around 1% year on year.

**ii) What is the current student accommodation position in the City?**

The latest formal position is set out in the 2007-08 Annual Monitoring Report (CD7/25). This covers the period 2006-2007 for student accommodation.

**University of Oxford - number of students 2006/07**

<b>University of Oxford – total students</b>	<b>24,640</b>
Undergraduates	16,140
Postgraduates	8,500

**Full time students 18,100**

Students who need to be accommodated	<b>17,020</b>
Discounted to take account of visiting students who do not reside in Oxford, those students who live abroad, and those who live with parents	

**Units of student accommodation 13,799**

Students living outside provided accommodation	<b>3,221</b>
Percentage of students in provided accommodation	<b>77%</b>

Source: Annual Monitoring Report 07/08

**Oxford Brookes University - number of students 2006/07**

**Oxford Brookes University – total students 18,770**

Full time students	12,690
Full time students based in Oxford	7,075

**Units of student accommodation 3,742**

**Students living outside provided accommodation and not in the original family home 3,425**

Percentage of students in provided accommodation	<b>53%</b>
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Source: Annual Monitoring Report 07/08

As a result of the above information, the University of Oxford needed to build 221 units of student accommodation, and Oxford Brookes University 425 units of accommodation; a total of 646 units.

Appendix 1 calculates the impact a cumulative 1% annual growth in full time students at Oxford Brookes University based in Oxford would be over the remaining plan period. This takes the figure from 7,075 to 8,547, which is an increase of 1,472 students. If one combines that with the shortfall of student accommodation at 2006/07 (425) then that indicates that at the projected growth of OBU, they will need to provide **1,897** more units of accommodation by 2026.

Oxford Brookes University - students

5 year period – based upon academic year Increase in students over 5 year period

2006 - 2011	<b>358</b>
2011 - 2016	<b>375</b>
2016 - 2021	<b>395</b>
2021 - 2026	<b>415</b>
See Appendix 1 for calculation	

It is helpful to compare the identification of sites for student accommodation to the requirements for identification of sites for housing as set out in PPS3 (CD11/3). One could consider a 5-year and 10 year land supply. It is considered that there are sufficient specific deliverable sites to deliver student accommodation for the first five years. The sites identified in Appendix 2 are available, suitable and achievable. For example, for OBU the first five-year requirement would be the shortfall (425 units) plus a five-year growth total, (358 units) which totals 783 units.

In addition, one can see from the list, that there is a supply of developable sites for years 6-10. This approach to student accommodation can be expanded further as part of the evidence base work for the Site Allocations DPD.

**iii) Why is the limit set at 3,000?**

The current adopted / saved policies in the Oxford Local Plan OLP 2001-16 (CD7/6) (policies ED.6 and ED.8) place a restriction on each institution, which allows them to have up to 3,500 students living out up to the academic year starting autumn 2008. From this date, the restriction is reduced to 3,000. During the production of the Local Plan, it became very clear through community consultation that while the previous Local Plan 1991 – 2001 (September 1997) policies (HO26 and HO28) (*see Appendix 3*) were working to a point, that the communities that were being affected still felt the level was too high. The OLP therefore first restricts the numbers to 3,500, and then brings in a further restriction half way through the plan period to reduce the level to 3,000.

In the production of the Core Strategy we did consider whether the policy should seek to restrict the number of students living out further. While to some extent this would have many benefits, the decision was taken to keep the level the same. This is primarily for two reasons:

1. We would need to identify sufficient sites to provide 1,000 units of student accommodation (500 per institution). It may be difficult to identify this land in addition to the land required anyway for each institution to maintain the 'status quo' of students living out as the natural growth of each institution continues.

2. A balance needs to be struck between sites identified for student accommodation, and those identified for normal housing – especially considering Oxford’s huge need for housing, including affordable housing.

It should be remembered that student accommodation is by far the highest land value in Oxford. This is especially the case compared with residential sites due to the requirement for affordable housing. This has led to a growing trend in Oxford for private student accommodation providers, such as Unite, to compete with residential developers for land. Having then acquired the sites, they then ‘tout’ their development around between Oxford Brookes University, and the Colleges of the University of Oxford.

The Inspector for the Oxford Local Plan (2001-16) (CD7/7) said in relation to the level of students allowed to live out (Inspectors Report para 10.10.12) that *‘in my opinion, the policy represents a reasonable balance. Indeed, the effect of the university on the local housing market should not be further exacerbated without very strong reasons to the contrary.’* Further, he continued (para 10.10.15) *‘restricting the number of students in non-provided accommodation is an imperative in the context of Oxford.’*

The Core Strategy, in bringing the level forward from the adopted / saved Local Plan, has taken the appropriate steps. It has considered whether the policy is necessary. Having concluded that the policy is necessary, it has then tested whether the level was appropriate or should be reduced or increased. We concluded that it was appropriate the provision should be made for 100% of the additional students. The main objective is to ensure that the pressure on the existing housing stock does not exceed present levels.

Sustainability Appraisal (CD4/1) considered this issue in pages 38 – 41.

**iv) What would be the implications for the 2 universities of the application of this policy?**

This policy basically maintains the status quo set by the adopted / saved OLP policy. The sections above explain why both a policy is necessary, and why the limit of 3,000 is still considered appropriate.

The implications of this policy are basically that both Universities need to plan for the natural growth they plan – circa 1% per annum. This would be monitored each year through the AMR, where each University supplies information to the City Council.

The policy has teeth when determining planning applications for academic floorspace. If the evidence is that the university does not have sufficient student accommodation then either:

1. Planning permission would be refused if the institution had no way of complying with the policy; or
2. If it was a timing issue, then either a Grampian style condition or obligation would be imposed which would prevent development until sufficient student accommodation was provided.

**v) Is there realistic potential for universities to provide further residential accommodations for students, or would this policy serve to unreasonably limit the potential growth of the universities?**

As set out above, the Core Strategy policy seeks to maintain the policy requirement of the adopted Local Plan. Therefore the requirement is for each university to house the increase in students they have year on year.

In fact, this is also the approach each University is applying themselves. It is critically important when competing with other Universities nationally, and internationally, that the 'offer' to students is high. The ability to offer high quality student accommodation to undergraduates is critical to that. A recent example of this is the recent planning permission for development of Pembroke College (ref. 09/5534 FUL) where this was precisely the case put by the College.

There are a number of sources of student accommodation:

1. There are sites specifically allocated for the use, currently in the adopted / saved Oxford Local Plan, and others will be considered during the production of the Site Allocations DPD;
2. a certain amount of student accommodation can be expected as development within grounds of individual colleges, or as extensions to college-owned properties; and
3. There are unallocated / windfall sites.

As referred to earlier, there are a number of private student accommodation providers, such as Unite, who are seeking to develop in Oxford. For example, Unite have planning permission for 353 units at the TA site in Hollow Way.

**vi) If so, where would this be? Should the policy go to identify where and how further student accommodation could be provided?**

Appendix 1 to this document lists the current sites either with planning permission, current applications, or site allocations in the adopted / saved Local Plan. This

shows that there are almost 3,100 units of student accommodation in the pipeline. It is therefore considered that there is no need for the Core Strategy to identify where and how further student accommodation should be provided.

Oxford Brookes University has suggested in their representations that a strategic site should be allocated in the Core Strategy. We disagree with this. The approach taken in the Core Strategy is that strategic sites should be around 10 ha in size. PPS12 (para 4.6) advised that Core Strategies should allocate those strategic sites '*considered central to the achievement of the strategy*', but goes on to say '*progress on the core strategy should be held up by the inclusion of non strategic sites*'. Therefore there are no sites for student accommodation which we would describe as strategic in this context.

Clearly the site allocations DPD will consider in more detail the need to allocate sites for student accommodation, especially when reviewing sites currently allocated for the use where development has not yet come forward. It is not considered that there will be any difficulty in either university complying with the requirements of the policy.

**vii) Is the restriction proposed in the final paragraph of the policy, to those in full time education, reasonable and appropriate?**

This restriction seeks to ensure that purpose built student accommodation is only available to those in full time education. Clearly as outlined above, a balance needs to be made between sites for purpose built student accommodation, and those sites which deliver housing (both market and affordable).

If a student is not in full time education, then they are more likely to be in one of two scenarios.

1. Someone who is working and undertaking some education alongside their main job – such as day release. These people should be looking to live in a C3 dwelling house in a normal way; or
2. Junior researcher / worker at the University, who is working for the University, but maybe completing their PhD along side it. If these are University 'key workers' then there is existing policy background in the adopted / saved OLP to cover this situation.

In both of these scenarios the occupants would not be full time students, and their needs should not be met by purpose built student accommodation.

**viii) Does policy CS.31 have any implications for the provision of student accommodation?**

The amendments to Policy CS31 were made on the advice of the Government Office regarding the wording of policies. The City Council is therefore reluctant to revert to the original wording.

The City Council believes that in strategic planning terms, medical research is appropriately located close to the existing hospitals, but also acknowledges that there is a need for purpose built student accommodation for Oxford Brookes in the same area of the City.

Policy DS.64 on the adopted / saved OLP does not allocate the site exclusively for student accommodation for OBU. The Policy states

“Planning Permission will be granted at the Park Hospital site for development of:

- a. healthcare facilities associated with the Oxford Radcliffe Hospitals, Nuffield Orthopaedic Centre or Oxfordshire Mental Healthcare NHS Trusts; and
- b. related small-scale teaching, research and ancillary administrative accommodation; and/or
- c. Oxford Brookes University purpose-built student accommodation.”

In any event, the University of Oxford now owns the Park Hospital site.

The main issue is whether there is sufficient sites / units coming forward in the area in order for OBU to comply with the policy. As set out above, and as listed in Appendix 2, there are approximately 3,100 units of student accommodation in the pipeline. Therefore the current wording of Policy CS31 does not have any overall impact on the provision of student accommodation.

**ix) Should any exceptions be made to the requirement of policy CS26 that students do not bring cars to Oxford?**

It has been a long-standing policy in Oxford that students will not be allowed to bring cars into Oxford. This is covered in Policies ED.6 and ED.8 in the 2001-2016 Oxford Local Plan (CD7/6). This policy approach forms part of the Oxford Balanced Transport strategy.

This clause is included with all planning permissions for student accommodation, either as a planning obligation forming part of the S106 legal agreement, or as a planning condition.

Both the University of Oxford and Oxford Brookes University support the principles of this policy. Both institutions take active steps to enforce this approach, and where

necessary if students refuse to comply with the requirement, students are removed from halls. This is very rare.

The only issue raised by OBU was to ensure that provision could be made for disabled and operational parking. This is accepted, however we consider this level of detail is more appropriately covered in the Development Management DPD that will review car parking standards, and any future SPD to support that DPD.

## Appendix 1

### Estimated number of OBU students who live in Oxford

Based on 1% growth

2005/06*	<b>7004</b>		
2006/07	7075	2016/17	7815
2007/08	7145	2017/18	7893
2008/09	7217	2018/19	7972
2009/10	7289	2019/20	8052
2010/11	<b>7362</b>	2020/21	<b>8132</b>
2011/12	7436	2021/22	8213
2012/13	7510	2022/23	8295
2013/14	7585	2023/24	8378
2014/15	7661	2024/25	8463
2015/16	<b>7737</b>	2025/26	<b>8547</b>

\* Estimate

Figures relate to academic years

Net increase in OBU students within Oxford over plan period = **1,543**

5 year period – based upon academic year	Increase in students over 5 year period	Expected number of students
		7004
2006 - 2011	<b>358</b>	7362
2011 - 2016	<b>375</b>	7737
2016 - 2021	<b>395</b>	8132
2021 - 2026	<b>415</b>	8547

### Sites for student accommodation

BT site, Hollow Way. Allocated in Local Plan – DS.12. Estimated potential for approx **300** student rooms.

Former Bus Garage site, Cowley Road – current mixed-use planning application for **106** student rooms and an enterprise centre on part of the site (09/01201/OUT)

381-389 Cowley Road – appeal allowed for **129** student rooms. (07/01577/FUL)

Dorset House, London Road. Allocated in Local Plan – DS.27. Site is owned by Quintain, but it understood the OBU are in discussion with them. Estimated potential for around **250** student rooms. (Note response from OBU suggested capacity nearer 300 units)

Harcourt House, Marston Road. Allocated in Local Plan – DS.32. Site allocated for Brookes use. (Note response from OBU suggested capacity of **360** units)

Keble College (former Acland Hospital Site). Allocated in Local Plan – DS.2. Planning application 09/322 FUL – to be withdrawn – new application expected. Potential for **227** units (student rooms and fellows).

Part Manzil Way Gardens and 205 Cowley Road – mixed use scheme including **32** student rooms (09/00731/FUL), going to East Area Parliament on 17<sup>th</sup> June, recommended for approval

Marston Road – current application for **361** study bedrooms in a part three/part four storey building, arranged around a central courtyard. Decision pending. (08/00688/FUL)

Morrell Hall. Planning permission 07/00616/FUL. Net increase of **79** student rooms in two blocks on three floors, now nearing completion.

Park Hospital site. Allocated in Local Plan – DS.64 – partly for Brookes student accommodation, estimated potential for **60** student rooms. Site now owned by University of Oxford. Outline planning application may be submitted shortly.

Pembroke College. Planning application 09/5534 FUL; resolved to grant planning permission subject to S106. **91** student rooms.

Roger Dudman Way (telecom compound, Venneit Close) – construction of **48** student rooms. Decision pending (07/00885/FUL)

St Aldates/Queen St. – current planning application for mixed-use scheme including **96** student rooms. (08/02261/FUL)

61 St Aldates (House of Spice). Planning permission 07/01253/FUL.  
Construction of **53** student rooms on four and five floors.

St Clements car park site. Allocated in Local Plan – DS.82. City Executive Board recently gave approval for the disposal of the Council's leasehold interest to facilitate a scheme for student accommodation. Estimated potential for up to **128** units.

TA site, Mascall Avenue. – Planning permission 07/02261/FUL for mixed residential and 353 student rooms. New application for erection of **374** student rooms in linked blocks on three and four floors.

Travis Perkins, Chapel Street. Estimated potential for approx **200** student rooms (mostly to be occupied by St Hilda's College, but potential for some undergraduate accommodation for another institution)

Warneford Hospital Site / Playing Fields. Allocated in Local Plan – DS.86. Previous outline application (withdrawn) proposed **150** units.

Windmill Road – 2 schemes at 88 and 90 Windmill Road. Scheme at 88 provides **23** student rooms in two blocks on two floors. Scheme at 90 provides **26** student rooms in two blocks on two and three floors. Both schemes completed 27/05/09 (06/02539/FUL & 06/02540/FUL). Owned by Dominion Housing Association – leased to OBU

Potential total = **3,093**

**Oxford Local Plan 1991 – 2001**

Adopted 5<sup>th</sup> September 1997

**HO 26** In co-operation with the Oxford university authorities the Council will seek to ensure that the number of junior members of the university living outside provided accommodation does not exceed 4,000.

*Note*

*Provided accommodation here includes all existing dwellings with an authorised use for student accommodation.*

**HO 28** The Council will carefully consider any proposals for teaching/administrative accommodation for their effect on student numbers and seek the co-operation of Brookes University in ensuring that the number of full-time students living outside provided accommodation does not exceed 4,000 and, in particular, than any increase in student numbers is matched by an increase in student accommodation.

*Note*

*The reference to students living outside provided accommodation and an increase in students excludes those living at their family home. Provided accommodation is defined in the footnote to HO 26*