

Policy H2 207

SUMMARISED

# View Response

## Response Details

From Frank Gargent

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Email Address



Postal Address

Postcode OX4 1DY

Gender

What is your age?

If you are under 16,  
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birth?

What is your ethnic  
group?

Your ethnic group (if  
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Organisation Name

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within the Organisation

Areas of Interest

Survey Types

1

Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number below)

- Paragraph  Policies Map  
 Policy Number  Sustainability Appraisal

Please give the relevant paragraph or policy number

H2

207.1  
-852

2

Do you consider that the document:

Select the most applicable option in each row.

	Yes	No
(a) is legally compliant?	<input type="radio"/>	<input type="radio"/>
(b) is sound?	<input type="radio"/>	<input checked="" type="radio"/>
(c) complies with the duty to co-operate?	<input type="radio"/>	<input type="radio"/>

3

Do you consider that the document is **unsound** because it is **not**: (tick as appropriate)

(a) positively prepared?

(b) justified?

(c) effective?

(d) consistent with national policy?

4

Please tell us below why you consider the document to be unsound, not legally compliant or fails to comply with the duty to co-operate. If you do believe the document is sound, legally compliant, or complies with the duty to co-operate you may use the box to explain why.

St Hilda's College considers that the Local Plan is unsound and ineffective because it no longer provides for any exceptions to the requirement for new student accommodation to provide a financial contribution to affordable housing elsewhere in Oxford.

The College is lodging an objection requesting that the list of exceptions in the Sites and Housing Plan Policy HP6 be inserted into Policy H2.

The rationale offered in the Local Plan for seeking an affordable housing contribution in respect of developments of student accommodation is defective insofar as it ignores the exceptions under existing policy HP6. College academic sites are not otherwise available for development as housing and the Council is not losing affordable housing by allowing colleges to develop their sites by providing accommodation for their own students. To the extent that such a level would deter colleges from developing their sites in this way, it would act contrary to the City's policy (H9) of encouraging the rehousing of students in order to release accommodation in the private letting market.

Further, there is no development surplus from which such a levy may be funded. It can only be funded through seeking additional philanthropy and increased rents from students. Developments of accommodation on a college site are not carried out with

the intention of creating a development gain. The accommodation will be principally used by a college in meeting its educational objectives and colleges almost invariably offer accommodation to their students on terms that are not commercial, notably for only a part of the year and at rates that are below the private market in Oxford when allowing for utilities, security, cleaning etc. The notion of a development surplus is thus meaningless in this context.

Finally, increasing the capital costs of student accommodation through the addition of an affordable housing levy that has to be recovered through higher rents, would increase costs for students and undermine the colleges' efforts to widen access.

## 5

What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) It would be helpful if you could suggest revised wording for the policy or text in question.

The exemptions available under existing policy HP6 should be reinstated in proposed policy H2.