

Oxford Local Plan 2036

Examination – Hearing Statement – Inspectors’ Matters and Issues

Matter 4 - Housing delivery

Day 2 on 4 December 2019

And

Matter 5 – Housing for particular groups

Day 4 on 10 December 2019

By University of Oxford (Respondent Number 39)

1. Introduction

- 1.1 This Hearing Statement has been prepared by The Chancellor, Masters and Scholars of the University of Oxford (hereafter “The University”).
- 1.2 This Statement responds both to the Inspectors’ question at Matter 4 - Housing delivery and Matter 5 – Housing for particular groups.
- 1.3 This statement is concerned with the Local Plan requirements for the provision of student accommodation and the potential adverse impact on housing delivery. It comments on the numerical contribution to the housing trajectory of new student accommodation and the implications of the blanket requirement in Policy H2 b) to the requirement for new student accommodation to provide a financial contribution to affordable housing elsewhere in Oxford.
- 1.4 It is not clear from the Inspectors’ Matters and Issues whether the University’s objections are more suitably considered under Matter 5 or whether its objections, in part, should be included under Matter 4.

2. Whether the housing trajectory and its underlying assumptions and evidence provide a realistic and reliable assessment of the rate of housing delivery.

- 2.1 The University has lodged an objection requesting that the list of exceptions in the Sites and Housing Plan Policy HP6 be inserted into Policy H2 b). It considers that the Oxford Local Plan (OLP) is unsound 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.

- 2.2 Under draft Policy H2 b) the City Council would require a financial contribution even where the new student accommodation is within an existing University or college academic site or the accommodation is necessary to enable the University to meet the student number threshold in OLP Policy H9- Linking the delivery of new/redeveloped and refurbished university academic facilities to the delivery of university provided residential accommodation (Student Threshold policy).
- 2.3 The quantum of the contribution required by Policy H2 b) is calculated using the formula in Appendix 3.2 of the OLP. This explains that:
- “The City Council would, ideally, seek 50% of the value of the land being developed as a financial contribution from student accommodation developments. This would represent the cost of providing what would have been the land for affordable housing development, should the site have come forward for residential development”
- 2.4 This Appendix uses the same explanation as the Sites and Housing Plan and, therefore, implies that the principle behind the City Council’s requirement for a financial contribution from student accommodation has not changed since that Plan.
- 2.5 There are important instances where the land to be used for new student accommodation is already owned by the University or a college and there is, therefore, no opportunity to reduce the purchase price for the land to accommodate the additional financial contribution. There is no ‘development surplus’ as implied in the OLP Appendix.
- 2.6 Policy H2 as drafted is poorly explained and is not consistent with Appendix 3.2. It will have the effect of discouraging the provision of student accommodation by the University and colleges. The University is concerned that even new student accommodation on existing academic or current student accommodation sites will not proceed because it will not be able to afford to build the new accommodation and find the extra money to pay the financial contribution required by the Policy.
- 2.7 The University has prepared detailed project appraisals on at least 6 of its sites allocated in the OLP. This includes indicative design proposals and business cases. It has concluded that there is no deliverable business case if the financial requirement in Policy H2 b) is included. This means that it will not proceed with development on these sites such as at SP 35 Court Place Gardens. As a result there will be an adverse impact on the OLP’s housing delivery. The Council’s housing trajectory is dependent on 15% of its minimum housing target of new homes in Policy H1 coming from student accommodation. This is 1630 units derived via the

ratio 1:2.5 of units from student accommodation. (Figure drawn from the HELAA 2019 PSD 2 to 5). The retention of Policy H2 b) in an unmodified form puts this in doubt.

2.8 The University considers that it would be reasonable for Policy H2 b) to indicate that a financial contribution to affordable housing elsewhere in Oxford should only be sought from new student accommodation where it is proposed to build on land that is suitable for general housing or it is conceivable that the site might accommodate general housing.

2.9 The University considers that a limited number of exceptions in Policy H2 (but not to the inclusion of the full list of exceptions in Policy HP6) would overcome its concerns whilst also enabling the OLP to have sufficient control to ensure that the policy requirement is not circumvented.

2.10 The Inspectors are invited by the University to consider the following list of exceptions to be included in Policy H2 b) as a Major Modification:

a) proposal is within an existing university or college academic site or hospital and research site, as defined in the glossary; or

b) proposal is for the redevelopment and/or intensification of a site, where the main existing use is student accommodation; or

c) City Council agrees that site is not suitable for, nor capable of being made suitable for, general purpose housing.

2.9 The University considers, therefore, that in this specific instance of the provision of student accommodation the OLP's approach to housing delivery is not sound.

3. Whether the Plan's approach to the provision and location of student accommodation is sound.

3.1 The University has lodged an objection to OLP Policy H2 b) as explained above.

3.2 The University has made no specific comment, either in support of or as an objection to, OLP Policy H8: Provision of new student accommodation. However, the University has objected to other policies (SP 28 Park Farm and SP 53 OUP Sports Ground) requesting that the list of uses should include student accommodation. The University's position in relation to Policy H8 should be considered in that light.

3.3 The University is aware that the Policy H8 explains that planning permission for student accommodation will only be granted at a very limited number of locations, including on sites allocated in the Local Plan for this use. The policy also, in effect, restricts new student accommodation to occupation by students attending the University of Oxford, Ruskin College or Oxford Brookes University. .

- 3.4 The Inspectors, in Question 9 of their first set of initial queries and comments (IC. 1) comment on Policy E2 and H9 that where growth is unrelated to the number of students the policy would appear not to be fairly and reasonable related to the development. They also express a view that in Policy H9 the restrictive location requirements mean there are limited opportunities for additional accommodation.
- 3.5 The Inspectors go on, in Question 2 of their second set of initial queries and comments (IC. 2) to ask ‘what is the reason for strict location criteria?’.
- 3.6 The University has offered its support to OLP Policy H9: Linking the delivery of new/refurbished university academic facilities to the delivery of university provided residential accommodation. The proposal is that the number of full-time taught course students living in Oxford in non-University provided accommodation does not exceed 2,500 at the time an academic planning application is granted. This threshold will be reduced to 1,500 on 1 April 2022.
- 3.7 The University, together with its Colleges, takes extensive steps to build new and refurbish existing student accommodation so as to reduce the impact of students on the general housing stock in Oxford. The University has plans and strategies to provide new graduate accommodation so as to keep pace with the growth in student numbers. It has formed a joint venture with Legal and General to provide a thousand new units of accommodation for graduate students by 2023/4. It considers that this will also serve to decrease the pressure on the local market for student housing.
- 3.8 The University is concerned that its current plans for an increase in graduates to be matched by the provision of new graduate accommodation will be hampered by Policy H2 b) as set out in the OLP. As a result it may not be able to keep within the thresholds set out in Policy H9. It is aware that if the threshold is exceeded this has the potential to impact on its future planning applications for new academic floor space.
- 3.9 As recognised by the Inspectors in their initial queries and comments, there is a crucial inter-relationship between Policies E2, H8 and H9. The University agrees that this should be developed better in the OLP, to ensure that a potential lack of opportunities to provide student accommodation does not constrain unnecessarily the University’s vitality and growth in the future. The University welcomes the support for its growth in Policy E2: Teaching and research, permitting the redevelopment and intensification of academic and administrative floor space. However, the restriction imposed on this growth by Policy H8 and the Policy H9 threshold on the number of students living in Oxford in non-university provided

accommodation, is only reasonable and sound if the OLP makes adequate provision for student accommodation. This is reinforced by the University's request for a Modification to Policy H2 b).

- 3.10 The pace of growth of both post-graduate taught (PGT) and post graduate research (PGR) student numbers at the University has grown significantly in the last 10 years and the rate of this growth may continue to increase further. The University agrees with the City Council's comment (OCC. 1i paragraph 9.17) that:

“It is difficult to be certain over the longer term in respect of the future recruitment of students. Factors that can influence this may be within the institutions' control (e.g. fees, facilities, courses offered, maintenance of academic reputation) but are as likely to be outside their influence (e.g. government policy, macro-economic situation).”

- 3.11 Consequently the University's lack of objection to Policy H8 and its agreement to the thresholds in Policy H9 should not be taken to imply that it may not need to build post-graduate accommodation for both PGTs and PGRs on a greater range of sites than those allocated in the OLP. Hence its request under two site allocation SP policies for the option to build student accommodation in order to remain within the thresholds in H9.
- 3.12 The University has lodged objections to Policies SP 28 Park Farm, Marston and SP 53 OUP Sports Ground requesting that the list of permitted uses should include student accommodation. It is aware that the Oxford Centre for Islamic Studies and three colleges have also objected with respect to their sites along similar grounds. The City Council has offered already to Modify Policy SP 17: Government Buildings and Harcourt House and SP 26: Magdalen College to add in student accommodation to the list of permitted uses (OCC. 2 question 2). However, it has resisted the other requests.
- 3.13 The University does not agree with the comment by the City Council in its response to the Inspectors' initial queries and comments (OCC. 2 paragraph 2.13) that “enough sites have been identified to enable the universities to continue to meet their (student) housing needs”. It is seeking greater flexibility to provide new student accommodation for a future, yet uncertain, scale of growth in student numbers. NPPF 2019 advice is that “The preparation of all policies should be underpinned by relevant and up-to-date evidence” (paragraph 31).
- 3.14 The University considers, therefore, that the OLP's approach to provision and location of student accommodation is not sound.