



**Hearing Statement
Respondent Reference: 38
Oxford Centre for Islamic Studies**

**EXAMINATION INTO THE OXFORD
LOCAL PLAN 2016-2036**

November 2019

Introduction

1. This statement is submitted to the Examination into the Oxford Local Plan 2016-2036 on behalf of the Oxford Centre for Islamic Studies (The Centre).
2. This statement responds to each of the issues raised by the Inspectors in their Matters and Issues. The Inspector's questions are italicised with our response in plain font.

Word count: 1,153

Matter 5- Housing for particular groups

“Whether the Plan’s approach towards the provision of employer-linked affordable housing is proportionate and in accordance with national policy.”

3. The Centre does not consider the Plan’s approach towards the provision of employer-linked affordable housing is proportionate or in accord with national policy, principally due to the onerous requirements of policy H3 which are considered likely to be prohibitive. These go beyond those ordinarily applied to affordable housing and include scrutiny of access criteria and eligibility, rent policy levels. The restrictions will inhibit delivery of urgently required homes undermining the Plan's effectiveness.

4. The policy requirement for any worker homes which become surplus to an employer’s needs be handed over to a Registered Provider is also considered to inhibit its effectiveness. As explained in our Regulation 19 submission (paragraphs 4.25-4.26) there are quite foreseeable scenarios where this would not be practical or sensible for employers, residents, and Registered Providers. Where homes are provided by an institution within its own campus they may not be practical as homes for unconnected residents. It would seem desirable that the policy includes the alternative of a financial contribution instead of providing surplus homes ‘in kind’. This should serve to ensure efficient use of buildings can be made in the future with security of contributions to affordable housing.

5. While we consider policy H3 requires modification in order to be effective we do recognise that it is an attempt to make a positive contribution to delivery of the Plan’s vision for the city. Policy H3 is understood to offer an alternative for employers to provide affordable housing for their own purposes in place of expected contributions under policy H2, however this is not entirely clear. The Plan would benefit from modification to avoid ambiguity as to the status as H2 and H3 as alternative policies. We consider this is necessary if the Plan is to be effective and considered sound.

6. On the basis that policy H3 is an alternative to policy H2 it is considered necessary for the Centre’s sites (allocated under policy SP17) to benefit from its provision. For the avoidance of any doubt the site should be included in the

schedule of sites under Appendix 3.4. The need is explained in our Regulation 19 submission in paragraphs 4.28 to 4.33.

7. The sites (SP17) are longstanding allocations, they have not though been developed. Inclusion of the land on the schedule of sites benefitting from policy H3 (Appendix 3.4) is highly desirable to facilitate development and ensure effectiveness of the Plan.
8. The Centre has a need and duty to provide housing for its permanent staff working in the teaching, administration, and other essential on-site support services. The City's restricted housing market and extremely high house prices make it very difficult to recruit and retain staff. The same is true for early career academics who are at present forced to decline positions because they cannot afford to live in the city. This problem has to be addressed if Oxford is to attract the brightest and best, without whom it will be difficult to hold on to its reputation as a world leader in scholarship, which would inevitably impact the surrounding economy.
9. The Centre, as a Recognised Independent Centre of the University of Oxford, has from its establishment in 1985 always worked closely with the University, which is one of Oxford's key institutions and employers. Notwithstanding this the Centre notes the Inspector's observations with regard to policies in the Plan which make a distinction based upon the nature of the applicant, in particular those in IC1C. By the same token we consider policy H3 should allow for proposals from employers to be considered on their own merits, not pre-judged on the identity of the applicant.
10. In summary the Centre welcomes the provision of policy H3 as an alternative policy to enable the provision of affordable homes for workers which we consider could make a particularly beneficial contribution to the delivery of allocated site SP17 and achievement of the Plan's broader vision. While the policy is welcomed we believe the policy requires refinement, in particular review of the onerous requirements to ensure it is effective and compliant with the NPPF.

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

11. The Centre does not consider the Plan's approach to the provision of student accommodation to be sound, in particular with regard to the requirement for affordable housing contributions from all developments without exception.
12. The current Sites and Housing Plan includes a requirement for developments of student accommodation to contribute to affordable housing in certain circumstances. The policy does though include exceptions to safeguard against the policy inhibiting delivery of essential student homes, particularly those provided by academic institutions.
13. Student accommodation provided by institutions for their own purposes, particularly as part of campus developments, is often only marginally viable. This is principally down to higher build costs for a building intended to be a long-term development, and the responsibility to provide accommodation for students at a reasonable rent which reduces financial returns. The projects are distinct from commercial student schemes which are in the main designed with a shorter lifespan (i.e. lower build costs) and let on the open market (i.e. higher potential rents). This is explained in greater detail in our Regulation 19 submission.
14. We welcome the Inspector's enquiries into the viability and rationale of this policy in their initial questions to the Council (IC1), in particular questioning: *"why affordable housing contributions are sought in respect of student accommodation provided by the academic institutions on their own land"*. We do not consider this question has been addressed by the Council who in their response (OCC1E) have set out the rationale for seeking accommodation from student accommodation in general terms, but not addressed the particular question of the Inspectors with regard to institutions on their own land.
15. We remain firmly of the view that the proposed policy H2 with regard to student accommodation is likely to inhibit delivery of essential development by academic institutions, including the Centre, unless necessary existing exceptions are applied.
16. We trust the Inspectors will have regard to our earlier Regulation 19 submission on this matter (paragraphs 4.7-4.18) and therefore do not repeat our points in detail here, we do though stress that we do not feel this matter as raised by the Inspectors has been properly addressed by the Council.