

Planning Policy
Oxford City Council
St Aldate's Chambers
109-113 St Aldate's
Oxford
OX1 1DS

Turnberry

Our ref: OBU-LDF

Your ref:

26th March 2020

Dear Sir/Madam

**Oxford Local Plan 2036 – Main Modifications Consultation
Oxford Brookes University**

We write on behalf of Oxford Brookes University (OBU) in respect of the Oxford Local Plan 2036 Main Modifications being consulted on until 27th March 2020. I write to formally **support** the main modifications as proposed, subject to receiving clarity on a single point about the loss of student accommodation in Policy H8 (MM11) which we do not believe is sound.

Other than this one point, which was not discussed at the Examination although it was in our papers, the proposed modifications have emerged in response to the evidence we submitted to the recent Examination in Public and the related discussions between Oxford Brookes University and Oxford City Council. These exchanges were tabled and presented to the Inspectors at the close of the Hearings in December 2019.

We summarise OBU's support for these changes by main modification below:

Main Modification 7 – Policy H2 – Delivering Affordable Homes

Oxford Brookes University supports the inclusion of two exemptions where contributions towards affordable housing provision from student accommodation will not be sought. The exemptions (points i) and ii) on Page 27 of the Schedule of Proposed Main Modifications) allow OBU to develop new purpose-built student accommodation to meet the needs of its students. This is consistent with the evidence we put forward at the Examination in Public.

Main Modification 11 – Policy H8 – Provision of New Student Accommodation

OBU supports the first two clauses in Policy H8 (as proposed to be modified) for they flexibly allow the University to develop its own purpose-built student accommodation (PBSA) on or adjacent to its existing sites and setting requirements for private providers based on location. OBU also recognises the planning control measures proposed in b)-e) of the second clause and the need for these to apply to OBU students who will reside in privately-provided accommodation.

This being said, it is also the case that Policy H8 poses a challenge for projects where existing student accommodation is being refurbished (the third clause):

‘Planning permission will not be granted for developments that would lead to the loss of student accommodation unless new student accommodation is available for occupancy, within a reasonable and acceptable timeframe, by students of the same university or institution. New accommodation should be equivalent in amount, mix and affordability to the rooms being lost.’

This was raised in paragraph 4.4 of our Matter 5 Hearing Statement; the wording restricts OBU from opting to lose some rooms within an existing PBSA scheme during a refurbishment programme in order to replace older, inappropriate configurations with higher quality alternatives which are more aligned with student welfare and experience. The provision of larger rooms, ensuite facilities and social spaces, where these features are absent, could reduce the overall number of rooms, but make substantive and important contributions to student welfare. We would ask that this approach to ageing accommodation is not closed down by the policy as it will not always be possible to construct compensatory accommodation at the same time. This change would allow a degree of consistency between Policies H8 and H9, which sets parameters on what new PBSA schemes must include, and Policy H15 which seeks good quality living accommodation in all new development, as well as paragraph 117 of the NPPF:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”

We would suggest the following minor modifications are made to the clause in Policy H8 to make it positively prepared, consistent and therefore sound:

‘Planning permission will not be granted for developments that would lead to the loss of student accommodation unless new student accommodation is available for occupancy, within a reasonable and acceptable timeframe, by students of the same university or institution or the loss of floorspace is off-set by new facilities and spaces to directly support the welfare of students residing in the accommodation. New accommodation should be equivalent in ~~amount~~, mix and affordability to the rooms being lost.’

Alternatively, we would be happy to see this issue captured in the supporting text to the Policy and would be grateful if the City Council could consider options for capturing this important point.

Main Modification 12 – Policy H9 – linking the delivery of new/redeveloped and refurbished university academic facilities to the delivery of university provided residential accommodation

We support the proposed modification insofar as it relates to OBU. The provisions in point d. are as agreed between OBU and OCC during the Examination and it crucially gives OBU the ability to keep operating and investing in its estate. OBU also endorses the method for calculating the 'cap' in point d. and the supporting Appendix 3.5.

Glossary Terms

OBU's support for these proposed main modifications is dependent on the terms 'Campus' and 'Oxford Brookes University existing campus sites' being included in the Glossary for the Plan (Main Modification 11), as it is set out in PSD.27B.

Please accept this correspondence as a letter of support for the main modifications as proposed, subject to the comments regarding Policy H8.

Yours sincerely

Chris Pattison
Director of Planning



Oxford Local Plan 2036 Main Modifications Consultation Response Form

Please note this form has two parts:

Part A – Your details

Part B – Your consultation response

Please ensure you complete **both** parts of the form. Where possible, we would prefer responses are provided using our online consultation system econsult. To respond in this way, please follow this link: www.oxford.gov.uk/mainmods

Responses should be limited to the Main Modifications and the Sustainability Appraisal of the Main Modifications. Comments will be considered by the independent Planning Inspectors undertaking the examination of both Local Plans

All responses must be received by 4pm on 27th March 2020 to:

Planning Policy

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Email: planningpolicy@oxford.gov.uk

PART A – Your details

Please note: we cannot register your representation without your details.

Your Name:	
Organisation (if applicable):	
Address:	
Email:	
Date:	

<p>Do you wish to be notified when the Oxford Local Plan 2036 is adopted by the Council?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p>
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DATA PROTECTION

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2036 Main Modifications Consultation only, and we will only store your data until the Oxford Local Plan 2036 is adopted. Information you give in this form will be shared with the Independent Examiners.

Please note: Anonymous representations may not be accepted.

If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box:	<input type="checkbox"/>
If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box:	<input type="checkbox"/>

PART B – Your response

To which Modification(s) or part(s) of the Sustainability Appraisal does this response relate?	
Local Plan Modification Number(s) (Please state)	
Or, if you are commenting on the Sustainability Appraisal of the Main Modifications, please state which part(s):	

Do you Support or Object the proposed modification(s)? (Please tick)	
SUPPORT	<input type="checkbox"/>
OBJECT	<input type="checkbox"/>

If you object, please state why:	
The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government’s National Planning Policy Framework (paragraph 182). Please tick any which apply:	
Not positively prepared - i.e. strategy will not meet development needs	<input type="checkbox"/>
Not justified - i.e. there is no evidence to justify the modification	<input type="checkbox"/>
Not effective - i.e. it won’t work	<input type="checkbox"/>
Not consistent with national policy - i.e. doesn’t comply with the law	<input type="checkbox"/>

Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification(s) or part(s) of the Sustainability Appraisal of the Main Modifications. *(continue on separate A4 sheet(s) if necessary)*



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