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Via email - [ian@localplanservices.co.uk](mailto:ian@localplanservices.co.uk)

Dear Mr Kemp

**OXFORD LOCAL PLAN 2040 EXAMINATION - WRITTEN STATEMENT ON BEHALF OF UNIVERSITY OF OXFORD AND OXFORD BROOKES UNIVERSITY (REF NO. 199).**

**MATTER 1: PROCEDURAL / LEGAL REQUIREMENTS**

This Written statement has been prepared on behalf of University of Oxford and Oxford Brookes University, hereon referred to as 'the Universities', in respect of Matter 1 of the Oxford Local Plan 2040 Examination.

**Sustainability Appraisal**

**Q7 – How and when were options considered for: a) The overall scale of housing and other growth b) The distribution of development c) Potential site allocations d) Policy approaches.**

The Sustainability Appraisal ('SA') (CSD.004a, p.24) prepared by Oxford City Council outlines that students and student accommodation currently have a negative impact on the City and that if the Local Plan 2036 was continued rather than preparing a Local Plan 2040, the impact would in time become neutral/none.

Sustainable development and sustainable outcomes requires full consideration of the three aspects of sustainability which the SA fails to do in the appraisal and formulation of policy towards student accommodation and the proposal to cap the growth of the Universities by reference to the same.

There is no meaningful appraisal of the economic consequences at the National, Regional or City level of the approach proposed in the Local Plan 2040 as opposed to other reasonable alternatives. There is no meaningful appraisal of the environmental consequences of the approach proposed in the Local Plan 2040 as opposed to other reasonable alternatives. There is no meaningful appraisal of the social consequences of the approach proposed in the Local Plan 2040 as opposed to other reasonable alternatives.

Indeed, the SA, does not address the support for growth at a National Policy level.

In March 2019, the Department for Education and the Department for International Trade launched the International education strategy: Global potential, global growth. The strategy set out the UK Government's ambition to:



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- (a) increase the value of education exports to £35 billion per year by 2030;
- (b) increase the total number of international students choosing to study in the UK higher education system each year to 600,000 by 2030.

On 6 February 2021, the Government launched an update to its International Education Strategy. It restated the ambitions set out in the original strategy and highlighted progress since 2019, including:

- (a) the appointment of the International Education Champion; • the introduction of a new Graduate route for international students;
- (b) the introduction of new Student routes;
- (c) the Turing Scheme.<sup>16</sup>

A September 2021 London Economics report for Universities UK International and the Higher Education Policy Institute estimated the 2018/19 first-year cohort of international students in the UK would bring total economic benefits to the UK of £28.8 billion over the course of their studies. 21% of this was generated by EU students with the rest from non-EU students. The authors estimated the economic costs of these students at £2.9 billion. This included the teaching grant and student support for EU students, and costs of providing public services to international students and their dependents. The net economic benefit of this cohort was thus estimated at £25.9 billion. The report also made estimates of the net economic benefit per student and used these, combined with data on where all students live, to estimate the benefit in each Parliamentary Constituency across the country.

Within that study, the Oxford East constituency was identified as deriving the 9<sup>th</sup> highest level of benefit of all the constituencies in the UK in terms of the net benefit delivered by international students with a net benefit of £211m delivered within that constituency or some £1,740 per person residing within that constituency.

In 2013, the Department for Business, Innovation, and Skills published a report on the benefits of higher education participation for individuals and society. It considered the financial and economic benefits of participation in higher education, but also the wider “non-market” benefits.

For society, it highlighted the following:

- Participation in higher education can bring about greater social cohesion, trust, and tolerance, with universities and colleges helping to shape a regional environment open to new ideas and diversity.
- There is evidence to suggest an increase in graduate numbers leads to annual savings through reduced crime costs.
- Educated individuals are more likely to interact in social networks, participate in voluntary and charitable organisations, and engage with local government.
- On the benefits of higher education participation for individuals, the report highlighted:
  - Higher education has important consequences for social mobility, not only by improving the life chances of graduates but also through improving outcomes for their children.
  - Graduates have a longer life expectancy than non-graduates.
  - Graduates are more likely to lead healthier lifestyles and have better health outcomes.
  - Higher levels of qualifications, and continued formal and informal learning, have been found to be associated with greater well-being and an ability to cope better with distress.

The SA does not consider or appraise the consequences of the approach set out in the Local Plan 2040 or reasonable alternatives.

Currently, the existing Plan sets a threshold on the permissible number of students living outside of university owned or managed accommodation. The Local Plan 2040 proposes to maintain the principle of the thresholds via Policy H10 but with alternative caps, including a reduced cap for the University of Oxford.

The proposed Policy H10 (Linking new academic facilities with the adequate provision of student accommodation) has been assessed individually within the SA, concluding that the proposed policy would have a positive impact ('+') on local housing need and a neutral impact ('0') on all other indicators (CSD.004a, p.53), including economic growth. As outlined in the underpinning evidence base (HEA.008, p.69), the current pipeline of student accommodation is not sufficient to support the growth of the universities. Therefore, without identification of additional student accommodation sites, the proposed thresholds in Policy H10 are not justified or appropriate.

Unless alternative sites for student accommodation are identified, the proposed policy thresholds will serve as a brake on the future operation of both Universities, at the expense of economic activity within the Oxford cluster and the UK's objective of becoming a global lead in innovation. Further, other wider benefits such as those outline above will not be realised. The SA fails to acknowledge this and underestimates the negative impacts that could result if the proposed thresholds are imposed and alternative sites for student accommodation are not identified.

Furthermore, there is an inconsistency between how unmet general housing need and how unmet student housing are assessed within the SA. The SA prepared by Levett-Therivel in September 2022 (CSD.013) '*appraises the sustainability of some of the policy options for the Oxford Local Plan 2020-2040. It focuses on those options that could have significant sustainability impacts, or are likely to be controversial, or which might benefit from in-depth appraisal in order to fine-tune them*'. Unlike the policy options for the housing requirement for the plan period, Policies H9 (Location of new student accommodation) and H10 (Linking new academic facilities with the adequate provision of student accommodation) were discounted from further assessment on the basis that the options for these policies '*are similar to each other and are unlikely to have significant sustainability impacts*'. This is despite the Sustainability Appraisal Scoping Report, prepared in June 2021 (SUP.002, p.17), identifying the provision of student accommodation as a key sustainability issue and problem, integral to meeting local housing needs and ensuring that everyone has the opportunity to live in a decent affordable home.

Overall, the SA process has not robustly assessed the sustainability impacts of a shortfall in student accommodation and in doing so significantly overlooked the Universities' valuable contributions to the Nation, Region and the City. Given the critical role of the Universities, a shortfall in student accommodation warrants the same interrogation as a shortage of general housing to fully understand the potential impacts.

#### **Q8 – Were all reasonable alternatives considered?**

As outlined above, The Sustainability Appraisal prepared by Levett-Therivel in September 2022 (CSD.013) fails to assess alternative options for Policies H9 (Location of new student accommodation) and H10 (Linking new academic facilities with the adequate provision of student accommodation) on the basis that the options for these policies '*are similar to each other and are unlikely to have significant sustainability impacts*'. It is unclear how this conclusion has been derived at.

In particular, there has been no attempt to assess whether there are differential economic, social or environmental benefits of providing student accommodation compared to market/affordable housing. In addition, it seems that there has been no robust consideration of the allocation of greater amounts of

student accommodation within the city to demonstrate that the policy approach adopted is indeed the most sustainable option.

As a result, the Universities do not consider the SA to have assessed the reasonable alternatives that exist, nor to have assessed those alternatives on a robust basis.

Failing to ensure a sufficient supply of student accommodation will have significant sustainability impacts which the SA has failed to assess or acknowledge.

Yours sincerely

**Chris Pattison**  
Partner