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Our ref: 199
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Date: 24/05/2024

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Dear Mr Kemp

Via email - ian@localplanservices.co.uk

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

MATTER 2: THE DUTY TO CO-OPERATE

Housing needs and the housing requirement

Q1 – Who has the Council engaged with in terms of housing needs and the housing requirement. When did this take place and what form did it take?

As recognised in the Council's Sustainability Appraisal (CSD.004a, p.28), the links between provision of student housing and other types of housing should be considered when developing policies. In a similar manner, in order for the City to fully understand its unmet housing need, it needs to take account of the demand and supply of student accommodation and how this impacts on the Oxford housing market. As outlined in our previous representations and in the Icen Oxford Student Needs Assessment (HEA.008, p.69), the scale of potential student growth forecast over the emerging plan period exceeds the current supply pipeline by a significant margin.

Despite this, The City's Housing Needs are underpinned by the Oxfordshire Housing and Economic Needs Assessment (HEA.001) prepared in December 2022, with a subsequent Errata Note (HEA.002) produced in June 2023. The HENA did not consider the requirements for additional student accommodation when quantifying its unmet need. This did not take place until August 2023 when the Oxford Student Needs Assessment was undertaken. Therefore, discussions around unmet need did not take into account the full picture of housing need.

As outlined in the Icen Oxford Student Needs Assessment (HEA.008, p.70), students typically prefer to reside within the city, where they are in proximity to their university for lectures and the City Centre for services and nightlife. There may be some level of displacement between general housing need which can be met outside the City, and student accommodation which cannot.



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Further, it seems that there has been no robust consideration of the allocation of greater amounts of student accommodation within the city in place of market or affordable housing.

Q8 – How and when did the Council discuss the conclusions of the HENA, the estimate of capacity, the resultant housing requirement and the implications for unmet need?

The Oxfordshire Housing and Economic Needs Assessment (HEA.001) was prepared in December 2022 and underpinned the City's duty to co-operate discussions. However, the HENA failed to take account of student need, which was not calculated until August 2023 in Icen's Oxford Student Needs Assessment (HEA.008). With the exception of an errata note in June 2023 (HEA.002) to amend erroneous figures in the employment needs figures, the HENA has not been updated following the publication of the Icen student needs report. The full scale of housing need including student accommodation has not, therefore, been calculated nor discussed with neighbouring authorities during the plan-making process and the subsequent implications for unmet need remain undetermined. There is no discussion of student needs or accommodation recorded in any of the Statements of Common Ground agreed to date.

Other strategic matters

Q11 – Are there any other genuinely strategic matters as defined by S33A (4) of the Planning and Compulsory Purchase Act 2004, including any site allocations that may have cross boundary implications?

The Council's failure to account for specialist housing needs, in particular student accommodation, within the HENA has cross-boundary implications. The City is already unable to meet its own general housing needs. If the demand for student accommodation is factored in, this results in a greater amount of unmet need to be apportioned to neighbouring districts which has not been accounted for or even discussed as far as the Universities can identify. Given the importance attributed to the growth of Universities at a National policy level and the importance of the Universities regionally and to the City, this appears to be a significant strategic oversight with material cross-boundary implications.

Similarly, we consider the full employment potential of the Oxford Knowledge Intensive Cluster has cross-boundary implications. Oxford's employment land needs over the plan period have been calculated by Icen in the Housing and Economic Needs Assessment (HENA) (Errata 2023) as being between 269,000 - 348,000sqm. This includes 68,000-83,000sqm of office space and 106,000-167,000sqm of R&D space.

Within the Draft Local Plan 2040 the City claims to be in a '*strong position to meet its employment land needs for office/research and development (R&D) arising to 2040 within the city. This is through a locational strategy of intensification and modernisation of existing employment sites; the appropriate redevelopment opportunities to be delivered within the city and district centres; and without the need to allocate any significant new employment floorspace*' (CSD.001, p.57).

The Lichfields Oxford City Employment Land Needs Assessment (ELNA) Interim Report (September 2022) sets out a total employment supply to 2040 of 356,000. This includes 50,000sqm of additional space across Oxford Science Park and Oxford Business Park, and 187,000sqm through the regeneration of a number of the West End Sites. However, it is understood from the minor modifications (CSD.008) that the 2023 ELNA update report no longer forms part of the evidence base and that this has been replaced by the Icen HENA. The HENA fails to undertake any assessment of the supply of employment land to 2040. It is, therefore, unclear how the City have arrived at the conclusion that they have a sufficient employment supply to meet demand and what evidence underpins this.

Furthermore, research undertaken by Bidwells LLP indicates that additional demand for office and laboratory space alone could total 402,000sqm, assuming a 5% growth rate per annum. This demand

exceeds the total employment needs forecast in the HENA Errata, and the identified supply set out in the ELNA. Bidwells' research, therefore, indicates that demand for employment space will exceed supply in the period to 2040, thereby resulting in unmet need with cross-boundary implications that have not been addressed.

Yours sincerely

Chris Pattison

Partner