

Why student accommodation in Botley would sit empty: the case against Doric's white elephant

Summary

Planning application P13/V2733/FUL includes as one of its key elements the provision of 525 student bedrooms, located over 4 floors above the main 8000 sq m superstore. Much of the financial viability of the scheme as a whole seems to hinge on its successful delivery, particularly in supplying a steady 'local' supply of customers for the significantly expanded leisure facilities.

The application and its supporting Environmental Impact Assessment (EIA) make a number of broad claims regarding the demand for student accommodation in Botley.

By drawing on adopted Oxford city policies and compiling objective verifiable data on current student pressures within the wider Oxford housing market, **this report will demonstrate that the applicant's case for student housing is unsubstantiated by evidence, misrepresentative of the existing policy climate, and at high risk for economic failure.**

Specifically, this report demonstrates that:

- Oxford's Policy CS25, which sets a target cap for the number of students from each university living in private rented accommodation, is moderating the pressure by students on the wider housing market.
- The effectiveness of this policy measure is recognized in the conclusions of the Oxfordshire Strategic Housing Market Assessment (SHMA) section on student accommodation. The SHMA indicates that the real need is for self-contained postgraduate accommodation, and not the undergraduate 'bedsit' arrangement that is proposed.
- Botley is not recognized as a 'District Centre' by Oxford, as the applicant claims, and it has not been identified as a preferred site for student accommodation within Oxford's adopted Sites and Housing Plan.
- Botley currently has a very low presence of students in comparison to central and east Oxford, and thus it is not the focus of any City or VOWH policies regarding the strategic development of student accommodation.
- As the case study of Diamond Place / Ewart House demonstrates, the great city- and county-wide need for general and age-restricted housing is leading to these being prioritised in Oxford, even in 'prime' student accommodation locations such as university-owned land in Summertown.

Oxford Core Strategy 2026 and assessment of students in private accommodation

1.1 Oxford city has long acknowledged the pressure that its high number of students puts on the wider housing market. Student accommodation is thus highlighted in section 7.4 of the **Oxford Core Strategy 2026**, adopted in March 2011.

1.2 Oxford City Council notes that *‘increasing the amount of purpose-built student accommodation will be beneficial to the wider market. However, it is also important that new student accommodation should not be built at the expense of general housing’* (OCS 7.4.1). It advocates a good balance between general (especially affordable) housing and student accommodation, noting that the two often compete for the same sites.

1.3 In **Policy CS25**, the Oxford Core Strategy sets a cap for each of the two universities (Oxford and Oxford Brookes) of 3,000 full-time students who are living in Oxford but outside of university-provided accommodation. The universities may not expand academic or administrative premises if they exceed that cap. The policy also specifies that any future expansion of student numbers owing to additional academic/administrative floorspace *‘must be matched by a corresponding increase in purpose built student accommodation’*.

1.4 A follow-up Oxford City Council report by Tim Sadler in April 2012, **‘Student Numbers in Oxford’**, evaluated Policy CS25 with respect to then current (in late 2010) students in non-university accommodation. Part-time students, students already living in Oxford (with family or for work), late-stage PhD students, and several other categories are exempt from these figures and from CS25, as these are not the type of students who would be expected to reside in purpose-built student accommodation.

1.5 The Sadler report highlights both universities’ commitment to achieving the 3,000 student cap in private accommodation but notes some of the inherent difficulties. In particular, ***‘the universities cannot force students to live in halls, and many postgraduate and continuing, as opposed to first year, students may prefer to live outside of university/college provided accommodation’*** (p. 9). The report also notes that growth in student numbers is expected to be concentrated more towards postgraduates rather than undergraduate students (p. 6).

1.6 As of December 2010, this report notes that 3,251 full-time University of Oxford students and 3,686 full-time Oxford Brookes students were living in Oxford outside of university-provided accommodation. It also noted that 340 units were in the immediate pipeline for OU, with a further 652 with planning permission (presumably all at the Castle Mill site), and that OBU would provide another 430 units by 2013. Thus at the time of writing in 2012, **a total of 6,167 students were potentially in private accommodation**, below the 3,000 student cap for OU and just above it for OBU.

1.7 This is a **drastically different figure from the deficit of 14,601 student beds asserted in the EIA (14.126)**. These figures supposedly stem from a Savills report on Student Accommodation Demand for Botley District Centre. This report was not submitted with the planning application, a web link was not provided in the EIA, and the report could not be found through a standard search engine. **This high city-wide market demand for student accommodation purported in the EIA is unverifiable and highly suspect, as it directly contravenes Oxford city’s own evidence on this demand.**

1.8 The **Oxfordshire Strategic Housing Market Assessment (SHMA)** concurs with the numbers presented in the 2012 Sadler report and comments on future student accommodation needs, in light of predicted growth of student numbers and the implementation of Policy CS25.

1.9 For the University of Oxford, the SHMA states (paragraph 8.104) that

Despite the potential for expansion of the University, The University plans to have a policy of a “19,400 ceiling” on full-time students. Within this, the proportion of post graduate students looks likely to increase more than the proportion of post graduates [sic – cites Sadler report,

this should be undergraduates; see 1.5 above]. *This was confirmed by a conversation with The University of Oxford, which indicates that **overall future student numbers are not anticipated to increase looking forward**. It follows that whilst there may be some refurbishment of existing accommodation, **no large student residential schemes are planned over the next few years**. Instead, student growth will be static or may increase incrementally.*

1.10 For Oxford Brookes University, the SHMA states (paragraph 8.111)

Linked to the stable number of students looking forward, The University of Oxford Brookes does not have plans for the development of new halls. The University instead plans to manage and improve its existing accommodation. For example, the University said that there will be re-development of rooms at Harcourt Hill. It expects to move the residential element of its Wheatley campus in South Oxfordshire to Gypsy Lane in Oxford.

1.11 The SHMA concludes (paragraph 8.116) that

The policy framework restricting the scale of students living outside of University accommodation is likely to moderate the impact of changes in student numbers on the housing market. The University of Oxford's proposals for growth – particularly in the STEM subjects and medical sciences – however may create ***an additional 1,200 jobs and 1,000 post graduate student places***. Whilst some may live in student accommodation, ***the post graduate students may be more likely to exercise choice in the wider housing market***. Some may for instance move with their families. This may have some impact on the housing market locally (and has been considered through the economic-driven projections).

1.12 Thus, **the proposal for 525 non-self-contained student bedrooms is at odds with projected student housing needs, which are focused more on postgraduate students who are less likely to choose the type of student accommodation proposed for Botley.**

Specific sites for Oxford student accommodation do not include the Botley area

2.1 In February 2013 Oxford City Council adopted its **Sites and Housing Plan**, which specifies where planning permission for specialist housing including student accommodation will be granted.

2.2 Policy HP5 (described in paragraph A2.33 of the Sites and Housing Plan) specifies that student accommodation should be built in areas with access to public transport, and where great increases in activity along quieter residential streets is avoided. Policy HP5 further aims to '*ensure students are able to live in a convenient location, as well as helping to maintain the character of residential areas*'.

2.3 Without noting the wider context of Policy CS25 and its effect on limiting the numbers of students in private accommodation, the EIA (14.301) manipulates the conditions of Policy HP5, which states that

Planning permission will only be granted for student accommodation in the following locations:

a. on or adjacent to an existing university or college academic site^{##}, or hospital and research site (and only if the use during university terms or semesters is to accommodate students being taught or conducting research at that site), or

b. in the City centre or a District centre, or

c. located adjacent to a main thoroughfare*, or

d. on a site which is allocated in the development plan to potentially include student accommodation.

Also, planning permission will only be granted for student accommodation if:

e. for developments of 20 or more bedrooms, the design includes some indoor and outdoor communal space, and

f. a management regime has been agreed with the City Council that will be implemented on first occupation of the development (to be secured by a planning condition or planning obligation), and

g. the developer undertakes to prevent residents from parking their cars anywhere on the site, and anywhere in Oxford.

Planning permission will not be granted for any proposal that results in a net loss of purpose-built student accommodation.

2.4 The Oxford Core Strategy 2026 (1.1.9, and section 3.5, pp. 58-68) and the 2013 Sites and Housing Plan (A2.34 and supporting Policies Map) are specific about the Districts and thoroughfares to which they refer. **Oxford unambiguously defines its Districts as Summertown, Headington, Cowley Road, and Cowley/Blackbird Leys, in addition to the regional hub of the City Centre.** The applicant has self-defined Botley as a District Centre, but it is not recognized as such by Oxford City Council for policy purposes including HP5. Instead Botley is implicitly categorized as one of ‘several neighbourhood centres’ in OCS 1.1.9.

2.5 Appendix 3 of the Sites and Housing Plan specifies the ‘main thoroughfares’ along which student accommodation should be built, and the B4044 (West Way) is not among them.

2.6 The Sites and Housing Plan lists 24 development sites to potentially include student accommodation. The furthest west of these is the **Castle Mill** development beside the Oxford rail station, which appears in the ‘Northwest’ quadrant of the Policies Map near to Jericho, with **a further 3 site identified in North Oxford / Summertown.** Development sites for student accommodation are overwhelmingly concentrated in the ‘Northeast’ quadrant around the **Headington** and in the ‘Southeast’ around **Cowley Road**, with **6 and 8 identified sites for student accommodation, respectively.** The ‘Southwest’ quadrant contains the **City Centre**, with **5 identified sites as well as the St Clements car park** (located east of City Centre).

2.7 In this context of high city-wide demand and long-term planning for student accommodation, it is very telling that **no development sites for student accommodation are identified on the Botley Road, which does constitute a main thoroughfare in Appendix 3 of the SHP.** In contrast, an application for a relatively large site on Botley Road was recently granted planning permission for a medium-sized Waitrose supermarket, which might have – but did not – contain any student accommodation.

2.8 Paragraph 3.5.9 of the Oxford Core Strategy 2026 does not refer to a separate 'Botley' district but rather includes West Oxford in the '**City centre district area**' that is '*focused on the city centre...as the retail and commercial hub of the city*'. It notes the presence of the Osney Mead industrial estate and '*several large retail stores along Botley Road*', which does not convey the sense of a community hub separate to the city itself. It further notes that much of this district sits in the flood plain and has seen only 8% of housing completed in Oxford within the last two years, reflecting the significant geographical barriers that have resulted in Botley developing as a relatively self-contained suburban community rather than as a distinct district of the city.

2.9 It is also worth noting that Oxford City Council submitted a strong objection to this planning application in February 2014. It made no mention of Botley as a suitable location for student accommodation, but rather emphasized the proposal as a *retail* development that needed to reflect Botley's lower place in the retail hierarchy in comparison to Oxford city centre.

2.10 There is also no indication that there has been any 'management regime' developed or discussed with the City Council, as required in section (f) of Policy HP5.

2.11 **Oxford City thus does not regard Botley as one of its 'District Centres', and it has not prioritised it as an area for development of student accommodation.** The EIA's claim (14.309, 14.310) that Botley meets the conditions of Oxford's Policy HP5 is entirely false.

Concentration of 'student' houses in central and east Oxford

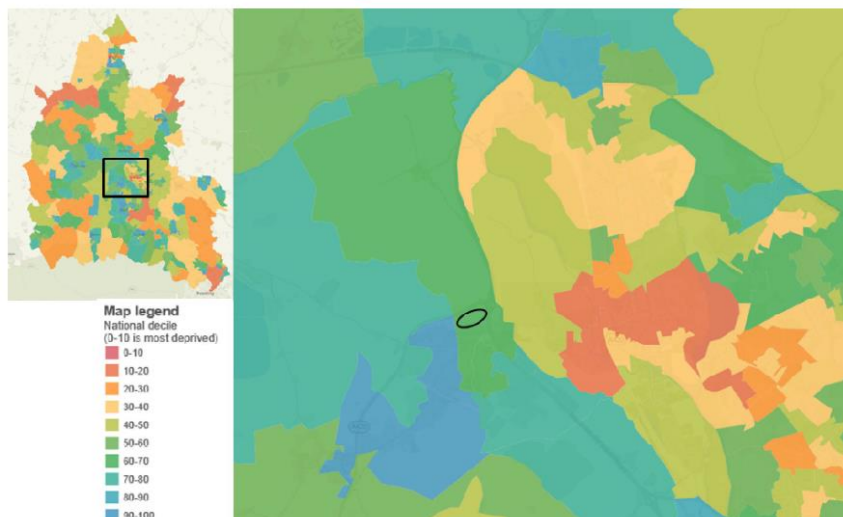
3.1 As indicated in the Oxford Sites and Housing Plan, student accommodation is planned mainly in central and east Oxford, where the university facilities are concentrated.

3.2 In our objection to this planning application in March 2014, West Way Community Concern submitted Appendix 8 in response to the applicant's argument for building student accommodation in Botley. Using city-wide data on the location of Houses of Multiple Occupancy – the type of accommodation for students in the private rental market – we presented figures that reflect **where HMO's, and thus students in private accommodation, are concentrated: 52% in OX4 (Cowley), 25% in OX3 (Headington), 13% in OX2 (Summertown and Botley), 10% in OX1 (city centre).**

3.3 These concentrations are verified in paragraph 14.85 of the EIA, which describes Indoor Environment deprivation as households that lack central heating and housing in poor condition. It states, '*The private rented sector is most likely to not have central heating, and this would match with the level of students living in private rented tenures in Oxford city centre*'. The accompanying image (Figure 14.19) shows very clearly where such homes are concentrated: in the city centre and to the east, in line with the HMO data.

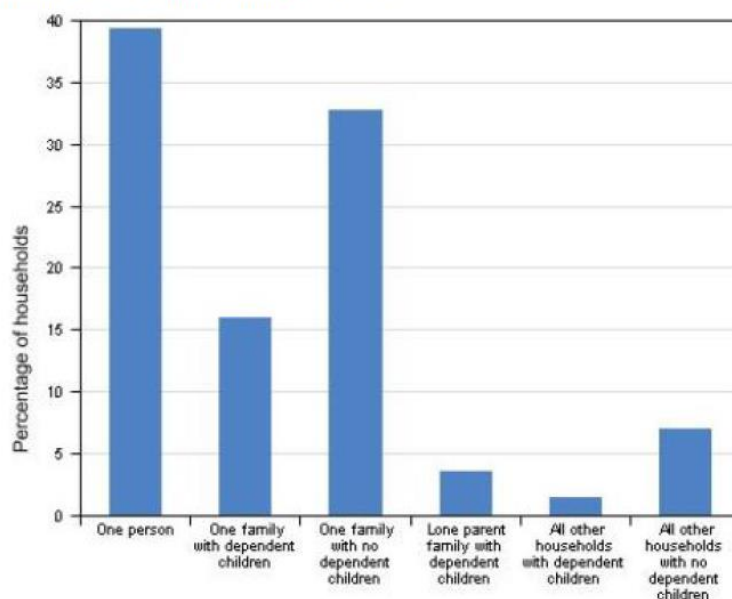
In contrast, Botley is in one of the lower deprivation zones for this metric, indicating an absence or low concentration of such homes associated with students.

Figure 14.19: Oxfordshire LSOAs IMD: Sub-Domain Indoor Environment (Application Site circled)²¹



3.4 These data accord with Figure 14.12 of the EIA, showing that the vast majority of households in the local area are one-person or family homes.

Figure 14.12: Household Composition in LSOA 002F9



8% of local households fall into the 'other' category, which would include all sharers including professionals. It is not possible to determine from these data how many of the shared houses are students, but the overall picture paints a stark contrast to sections of Oxford city where HMOs are in high concentration.

3.5 The overall Oxford housing market is more balanced between areas, reflected in the results of a recent Rightmove.co.uk search of all property currently available to rent in Oxford. This is a suitable time point for data collection, as many student properties will be currently up for re-let for the start of the next academic year:

Rental properties available on 16th June 2014

	<u>OX1</u>	<u>OX2</u>	<u>OX3</u>	<u>OX4</u>	Botley (within OX2)
houses	88	197	214	374	24
flats	216	291	163	164	28
area sub-total	304	488	377	538	52
percent of total	18%	29%	22%	32%	3%

The Botley rental market is thus a very small part of the total Oxford rental market, and its location outside of one of the areas in which HMOs are concentrated suggests that **the presence of students in Botley is currently minimal.**

3.6 The following statement from the December 2012 Harcourt Hill Masterplan confirm these low numbers:

*“The vast majority of existing students studying on the Harcourt Hill campus either live on the campus or in the city. **Only approximately 60-80 students currently live in local private housing.** The University recently carried out a survey which indicated that access to friends, the city centre, social facilities etc are most important to students when choosing somewhere to live. Therefore **we anticipate that increase in students will not significantly effect the local private rent market.**”* (p.16)

3.7 Applying this figure to the potential market of just over 6,000 students in private housing (see 1.6 above), **Botley contains around 1% of the city-wide student accommodation market.** Given Botley’s quiet suburban character and geographic separation from most city and university facilities, the students who choose to live here may be the more mature postgraduates who are less inclined to live in purpose-built student accommodation (1.5 above).

3.8 **The construction of such a large and imposing block of student accommodation, which has thus far not been supported by either of the two Oxford universities, is therefore entirely unjustified in a suburban residential area with such a low presence of students.**

3.9 The unsuitability of Botley for student accommodation is reflected in the absence of any student accommodation development sites identified near Botley in the Sites and Housing Plan, and the lack of any mention of Botley when assessing the city’s housing needs in the Oxford Core Strategy.

3.10 Vale of White Horse District Council is similarly silent on policies for student accommodation in Botley. Outside of Core Policy 10 of the emerging Local Plan, which addresses the redevelopment of the Harcourt Hill campus, there are no policies in place or proposed for the development and management of student accommodation within VOWH.

3.11 **This collective silence in policy, combined with all the evidence above, demonstrates that the case for student accommodation in Botley is entirely a creation of the applicant, rather than reflecting any objectively demonstrated need.**

Case study: Diamond Place and Ewart House, Summertown, Oxford

4.1 In contrast to Botley, the Diamond Place / Ewart House site has been identified by Oxford City Council as one of the 24 potential sites for development of student accommodation in the Sites and Housing Plan. Highlighted as site SP14 in the Northwest quadrant of the Oxford Policies Map, it is a 1.49 hectare site within the boundaries of the Summertown District Centre (dashed line on the map). The land is jointly owned by the City Council and the University of Oxford.



4.2 In March 2014 Oxford City Council released a public consultation document, 'Diamond Place Supplementary Planning Document', which outlined the envisioned development as '*a retail-led mixed-use development*' (p. 3). This document forms part of the second stage of public consultation, with a third stage and the final SPD to inform a subsequent development brief for the site.

4.3 This document follows on from the first stage of public consultation in Autumn 2013 and outlines options for various uses of the site, including retail and housing. Preferred options are listed for each category.

4.4 The preferred option for retail is '**Smaller retail option with flexibility**', entailing about 1000 sq m of retail that '*would prevent domination of the site by a large supermarket*' (p. 8). An alternative is the 'Larger retail option', described as '*Ground floor retail of 4000 m2 approx (scope for a medium size supermarket, similar in size to Aldi on Botley Road)*' (p. 9).

4.5 The preferred option for housing is '**General housing and potential for elderly persons accommodation (to include a minimum of 50% affordable housing)**', noting that '*Previous public consultation showed a strong interest in accommodating general market housing and also elderly accommodation on the site*' (p. 12) and that this option was thought to '*achieve mixed and balanced communities*'.

4.6 '**Student accommodation and general housing**' was listed as the third (alternative) option. The supporting text notes that the site is in a good location for student accommodation, '*However, it is considered preferable that the SPD tries to maximise the*

value of the general housing on the site and ensures that a maximum amount of affordable housing is delivered on the site' (p. 13). The description further specified that '*self-contained student accommodation would be most suitable for this site*', i.e. accommodation arranged as separate flats (predominantly for postgraduate students) rather than as single rooms along shared corridors (the Botley proposal).

4.7 Thus, even in a prime development site that has been previously identified for student accommodation, a more flexible smaller retail offering and the high need for general and age-restricted accommodation are given priority. This case study has relevance for development at Botley, where the same context of intense pressure for general and specialist housing in the context of an aging population is a key focus for VOWH policy.

Conclusions

The proposal for 525 student bedrooms in Botley is completely out of line with current housing pressures, existing policy, and projected future need.

This report has demonstrated the inherent high risk of the student accommodation element of Doric's proposal. In the context of such low local demand for the large number and type (undergraduate-style) of student units proposed, residents have very legitimate concerns that this accommodation, if built, would sit largely empty but would then not be suitable for conversion to general housing.

Much of the financial viability of the proposed development seems to hinge on the demand for student accommodation in Botley. This report demonstrates the applicant's case for this to be fundamentally flawed. We therefore conclude that this aspect of the proposal should be rejected, which might in turn lead to the rejection of the scheme as a whole.

References

Oxford Core Strategy 2026, adopted March 2011,

http://www.oxford.gov.uk/PageRender/decP/Core_Strategy_occw.htm

Oxford Policies Map, http://www.oxford.gov.uk/PageRender/decP/Proposals_Map_occw.htm

Oxfordshire Strategic Housing Market Assessment (SHMA),

<http://www.oxford.gov.uk/PageRender/decP/StrategicHousingMarketAssessment.htm>

Student Numbers in Oxford, report by Tim Sadler for Oxford City Council, April 2012

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