

Mr Mark Jaggard and Mr Adrian Roche  
Oxford City Council  
Ramsey House  
10 St Ebbe's Street  
Oxford  
OX1 1PT

September 23<sup>rd</sup> 2010

Dear Mark and Adrian,

**Statement from the Headington and St Clements Residents Associations Group.**

On the last day of the Inquiry into the soundness of the Oxford Core Strategy, Inspector Pratt directed that representatives of our organisation should meet with you to discuss our concerns about the lack of reliability and validity of the Council's data on student numbers and where university students live in term time. These concerns including an apparent lack of mechanism to implement, monitor and enforce the local plan policies dealing with student housing. The Inspector has asked us to put our concerns in writing to you and to copy him in. Our overall concern is that Oxford Brookes University (OBU) has a far greater number of students living in Oxford than has been reported in the City Council's Annual Monitoring Report (AMR). We also believe that the number of students who live in private accommodation exceeds the numbers stated by OBU.

1. We understand that OBU only reports figures for those higher education students who are registered for a degree course. For example, the 2008/9 AMR reports that OBU has 12,301 full-time students. We understand that in assessing the need for purpose built student accommodation you use these figures, which are for higher education students only.
2. The OBU student body also contains large numbers of international, EU and local students who attend OBU for sub-degree courses such as foundation courses, academic English language courses etc. (see: <http://www.brookes.ac.uk/international>). The OBU website indicates that overseas students on sub-degree courses qualify for purpose built student accommodation. We believe that many of the international students attending (short term and long term) sub-degree and degree courses live in purpose built accommodation during term time, whilst undergraduate and postgraduate higher education students live in private houses in numbers that are in excess of the local plan requirements. We note that overseas students add significantly to OBU income: in 2009 the OBU accounts show that overseas students (non EU domicile students) made a contribution of nearly £19 million.
3. OBU's School for Health and Social Care provides professional health care training which includes pre-qualification diplomas and degree courses. We understand that OBU has a substantial contract with the NHS to provide training for 3,000 health care trainees and that these health care training courses have apparently added about £10.5 million to OBU income. We would like to establish if all these health care students are included in the student figures provided to the City Council. We would also like to know if these health care students, including those on courses for pre-qualification

diplomas, qualify for purpose built accommodation even though they are not included in OBU's AMR student figures.

4. We understand that OBU students who study at Wheatley or Westminster College, but live in Oxford, and in particular in East Oxford (which is apparently desirable because of the 'nightlife') are excluded from the count of university students living in purpose built student accommodation within the city's administrative boundaries. There is no justification for this interpretation, as these students have the same effect on accommodation demand in Oxford as a student studying at the Gypsy Lane campus. Moreover, OBU at its central administrative and teaching centre in Headington still has overall responsibility for such students. We understand that the division in teaching and social life between these campuses is not hard and fast, so that the distinction is anyway largely artificial. All students under the aegis of OBU who are in private accommodation and purpose built accommodation should be included in the count. What are the numbers for students who have, in the past, been excluded by this mechanism?

5. Apparently OBU owns and manages a hundred or so private houses that it directly lets to students. Indeed, OBU advertising boards can be seen on houses in the East Oxford and Headington areas and its accommodation website. Such an arrangement is, we understand, called 'head-leasing', although there is no substantive difference between a private landlord and an institutional landlord. What is the status of such houses in the AMR? Some of them are classified as 'halls of residence', although the accommodation is not 'purpose-built' for students, and therefore students living in them should be included in the count of those living in private accommodation.

If 'head-leased' houses are excluded from the count, how many students have consequently not been included?

6. By way of an interim report, how many students living in accommodation that is not purpose built for student accommodation, in this and past years, have been excluded for the following reasons:

- i) not on degree courses;
- ii) excluded health care students;
- iii) students registered for study at Wheatley or Westminster;
- iv) students excluded because they are in 'head-leased' or in dwellings classified as 'halls of residence' accommodation where that is not purpose built for students.

7. As set out in the Local Plan, Oxford University and OBU are required to build dedicated student accommodation in order to free up family housing to alleviate the housing shortage in Oxford. This policy states that planning permission will not be granted for planning applications requesting an increase in teaching and administrative floor space unless the number of full-time students living in accommodation not provided by the university is less than 3,000.  
(Local Plan Policies ED 6 and 8)

8. The two universities are required to give the City Council detailed information about their student population including where their students live and how many live in private sector housing. This information is then reported in the Annual Monitoring

Report. OBU reported that in 2008, 3,795 of their students lived in private sector dwellings, but recently reported that this number is now less than 3,000. On numerous occasions local residents groups have stated that such data submitted by OBU (and possibly Oxford University) is not plausible, as they observe more and more residential houses being converted into shared housing occupied by students.

9. In the last 5 years the full-time university student population has remained more or less stable at around 30,000 (AMR's 2004-2009). The number of purpose built student residential units completed over the last five years is 1,000 (1). Another 2,000 are in the pipeline, either being in the process of being built or having received planning permission (1).

10. There does not seem to have been a corresponding increase in family housing caused by students moving out of private residential housing into purpose built accommodation. One would expect the number of council tax exempt dwellings occupied by full time students to have dropped. On the contrary, in the last two years the number of private council tax exempt properties occupied by students has increased by *more than* 274 dwellings, bringing the total number to 2,611 in 2010 compared to 2,337 in 2008. (2,3).The total number of dwellings which are exempt from paying council tax due to being solely occupied by students is about 5,000 dwellings if those dwellings classified as 'halls of residence' are included. (2,3)

Mark Jaggard's assertion at last week's Inquiry that this increase could be explained by a substantial increase in the non-university student population attending courses at other educational establishments such as secretarial colleges is not very plausible. This view was later confirmed by an administrative officer from the City Council's council tax offices.

11. In the light of these apparent inconsistencies, resident groups commissioned the Higher Education Statistical Agency (HESA) in August 2010 to analyse where OBU students live during term time, both in Oxford as in neighbouring districts. This analysis, based on figures supplied by OBU to HESA, was carried out for the years 2007/8 and 2008/9. The data indicates that at least [...] full-time OBU students, as defined for HESA and AMR purposes, live in either their own residence (not parental/guardian home) or other rented accommodation; this number is considerably larger than the number OBU submitted to the 2009 AMR. Compared with the previous academic year the number of OBU students living in private accommodation seems to have gone up, with a corresponding decline in the number of students living in institution-maintained property (3).

*\*This figure cannot be given here, as the information is not in the public domain. It is, however, available to Councillors.*

13. We would like to discuss the following:

What implementation mechanisms should be put in place to ensure that only full time Oxford higher education students take up purpose built accommodation?

What controls should be exercised in situations where the Local Plan policies are not complied with?

What independent auditing system will be introduced ensure accurate figures on where students live in term time?

How does OCC monitor the number of students' dwellings which are usually self contained flats? Are these dwellings including in Oxford's overall housing provision? Will OCC include the planned development for these self contained student dwellings in Oxford's future housing figures?

Many thanks and we look forward hearing from you,

Best wishes,

Sietske Boeles

On behalf of the Headington and St Clements Residents Groups Association (includes the Highfield, Jack Straw's Lane and Divinity Road Area residents associations).